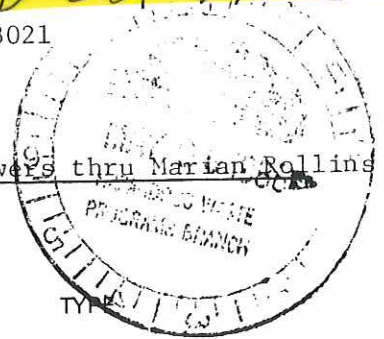


TEXAS WATER COMMISSION
INVESTIGATION REPORT
DISTRICT 6

TXD 089 792 543
XD 089 792 543
EF8803021



Date Investigation Requested 3-17-88 Source EPA - Mickey Flowers thru Marian Rollins

Name: Anonymous

Address: _____

City, State, Zip: _____

Telephone: _____

Location: Chemall, Inc., on Highway 366 at Hogaboom, Groves

Pollution, Surface Water _____
Pollution, Ground Water _____
Solid Waste X
Water Rights _____
Others _____

Alleged Problem: Illegal transporting and dumping of hazardous waste (Agent Orange by-product).
Drums of waste stored in big brown building on corner of property. Hundreds of drums
stored there. Drums being loaded into dump trucks and transported to a field at night.

Summary of Investigation: TWC District 6 representative Beth Tatum conducted an investigation at
Chemall on March 25, 1988. Drums of Class II & I non-hazardous wastes were shipped out
for disposal beginning 7-16-87. Destinations were BFI, Sorrento, LA and Beaumont Municipal
Landfill, Texas.

☐ Interim Status of Corrective Action if problem is not yet resolved.

☒ Final Resolution of Problem: Documentation of waste disposal appears to be correct and legal
(see attachments). No hazardous waste was disposed of, according to manifests and company
representatives Brian Davis and Gerry Roehrig. No Agent Orange by-product was disposed of
or stored by the company.

Date and method of notification of person making request for assistance or complaint: Unable to contact anonymous
complainant.

County Jefferson Segment No. 0601

Beth P Tatum

Signature of Investigator

River Basin Neches Permit No. 30446

Date: 4/15/88

PRC Engineering

prc

Planning Research Corporation

CHEMALL, INC.

U.S. EPA REGION 6

LOSS OF INTERIM STATUS INSPECTION

REPORT-CHECKLIST

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, D.C. 20460

Work Assignment No.	:	589
EPA Region	:	6
Site No.	:	TXD 089 792 543
Date Prepared	:	August 27, 1986
Contract No.	:	68-01-7037
PRC No.	:	15-5895-38
Prepared By	:	PRC Engineering (Edward Schuessler)
Telephone No.	:	312/938-0300
EPA Primary Contact	:	Linda Thompson
Telephone No.	:	214/767-2949

**PRIVILEGED WORK PRODUCT PREPARED
IN ANTICIPATION OF LITIGATION**

**ENFORCEMENT
CONFIDENTIAL**

INSPECTION CHECKLIST

LOIS INSPECTIONS - REGION VI

Facility Name: Chemall

EPA I.D. No: TXD 089 792 543

Inspection Dates: July 1, 1986

Inspector(s): Susan Burns and Denise Dyrby

Facility Representative(s): Brian Davis, Plant Manager

Robert Cogliandro

Enforcement Officer: _____

<u>Completed</u>	<u>Item</u>	<u>Section</u>
<u>X</u>	General Information	A
<u>X</u>	Executive Summary	B
<u>X</u>	Summary Report	C
<u>X</u>	List of Documents	D
<u>X</u>	Hazardous Waste Land Disposal Unit Description	E
<u>X</u>	SWMU Description	F
<u>X</u>	Organization Chart	
<u>X</u>	Facility Drawing(s)	

GENERAL INFORMATION

Facility EPA I.D. Number: TXD 089 792 543

Facility State I.D. Number (Describe): 30446 (TWC) Texas Solid Waste ID No.

Facility Name: Chemall

Facility Primary Contact (Name and Title): Brian Davis, Plant Manager

Facility Mailing Address:

(Street) Box 309 Phone: 409/727-7471

(City) Groves

(State) Texas (Zip) 77619

Facility Location:

(Street) 5500 Pure Atlantic H.W.

(City) Port Neches (County) Jefferson

(State) Texas (Zip) 77619

Other Facility Contacts:

Name: Richard Metts Title: Manager of Construction

Telephone: 409/727-7471 Responsibility: Familiar with past operations and
closure of surface impoundment

Name: Robert Cogliandro Title: V.P. of Finance

Telephone: 201/469-0076 Responsibility: Familiar with closure activities

Name: _____ Title: _____

Telephone: _____ Responsibility: _____

Name: _____ Title: _____

Telephone: _____ Responsibility: _____

EXECUTIVE SUMMARY

On July 1, 1986 a LOIS inspection team inspected the Chemall, Inc. facility in Port Neches, Texas. The team met with facility personnel to collect information concerning facility operations, site history, and past and present hazardous waste activities. A onsite facility inspection was conducted to verify facility operations.

Chemall, Inc. is a manufacturer of inorganic chemicals. It presently does not generate, treat, store, or dispose of hazardous waste. A toxaphene contaminated surface impoundment which resulted from past operations has been closed as directed by a court order. P.E. certification of closure was submitted to Texas Water Commission (TWC) on 7/30/84. Chemall submitted an Affidavit of Exclusion (AOE) on October 22, 1985. Chemall has received no response from TWC regarding the AOE.

Site History: Past owners from 1964 to 1977 were Sanford (a subsidiary of Iacon, Inc.), Bison Chemical, and Riverside Chemical (subsidiary of Cook Industries). These companies manufactured chlorinated hydrocarbons, chlorinated waxes and toxaphene among other products.

In 1977, Chemall, the present owner, (a subsidiary of Calabrian Chemicals Corp.) bought the facility. Brian Davis is the Plant Manager and facility contact. However, he has only been in this position for 1 1/2 years. The previous plant manager from 1980-1984 was B. L. Owen. Robert Cogliandro (of Calabrian Chemicals - 201/469-0076) is knowledgeable of environmental activities in the past and present.

On 8/15/80, Chemall submitted its Notification of Hazardous Waste Activity to U.S. EPA (Document 1). On 8/14/80, a Part A Permit Application was submitted to Texas Department of Water Resources (TDWR) (Document 2). The Part A stated that they manufactured lubricating oils and chlorinated paraffins. On 11/17/80, a Part A Permit Application was submitted to U.S. EPA (Document 3).

Chemall used a surface impoundment on site to spray-evaporate caustic scrubber solution that was generated during the manufacturing of chlorinated paraffins. Chemall stopped production of chlorinated paraffins in September of 1980 according to Brian Davis and Richard Metts. This surface impoundment had been contaminated with toxaphene by previous owners and has since been closed (Documents 4, 5, 6). Toxaphene analysis of

the closed pond and another surface impoundment on site are in Document 11. Chemall never processed toxaphene at this facility.

Chemall presently manufactures cuprous chloride, sodium thiosulfate and sulfuric acid. No hazardous waste is generated from these activities (Documents 8, 9). There was some question as to whether or not floor sweepings from the cuprous chloride area were hazardous or not. Chemall performed E.P. toxicity tests on this material and showed that it was nonhazardous (Document 10).

SUMMARY REPORTFacility Name: Chemall

HAZARDOUS WASTE NOTIFICATION STATUS

DOCUMENT

Original Submitted ☐ No ☒ Yes Date 8/15/80 1Amendment(s) ☒ No ☐ Yes Date(s) _____
_____Describe Amendments: _____

PART A APPLICATION STATUS

Original Submitted ☐ No ☒ Yes Date 8/14/80 TWC 211/17/80 3Changes ☒ No ☐ Yes Date(s) _____
_____Approved Changes ☐ No ☐ Yes Date(s) _____
During Interim Status _____☐ UndeterminedDescribe Changes: _____

LOIS CERTIFICATION

Submitted ☒ No ☐ Yes Date _____Certified Groundwater ☒ No ☐ YesCertified Financial ☒ No ☐ Yes ☐ Partial

LOIS VERIFICATION

Groundwater Monitoring System: NAWaiver Approved ☐ No ☐ Yes Date _____Last CME Conducted ☐ None ☐ Yes Date/ Agency _____Enforcement Action ☐ No ☐ Yes Date
Outstanding as of ☐ Unknown Issued
November 8, 1985GWM System Adequate ☐ No ☐ Yes Judged by _____
☐ Unknown

Inadequacies: _____

Financial NAC/PC Assurance ☐ No ☐ YesMechanism: _____ Amount Closure: _____
Effective Period: _____ Postclosure: _____Sudden Liability ☐ No ☐ Yes ☐ Variance Document _____Non-Sudden Liability ☐ No ☐ Yes ☐ Variance Document _____Financial Adequate ☐ No ☐ Yes Judged by _____

Inadequacies: _____

Part B ApplicationDate of Call In 6/6/85
Date of Submittal Chemall does not intend to submit a Part B application.NOD Sent ☐ No ☐ Yes Date(s) _____Complete ☐ No ☐ Yes Date _____

Deficiencies as of November 8, 1985: _____

CLOSURE PLAN

1. Name of Unit: Waste Water Treatment Pond

Unit 1 of 1 of Section E

Submitted for Approval	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	Date	<u>4/26/83 (Document</u>
Approved	<input type="checkbox"/> No	<input type="checkbox"/> Yes	Date	<u>4) *see note</u>
Implementing on Schedule?	<input type="checkbox"/> No	<input type="checkbox"/> Yes		<u>below</u>
Certified Closed by P.E.	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	Date	<u>7/30/84 (Document</u>
				<u>6)</u>

2. Name of Unit:

Unit of of Section E

Submitted for Approval	<input type="checkbox"/> No	<input type="checkbox"/> Yes	Date	<u> </u>
Approved	<input type="checkbox"/> No	<input type="checkbox"/> Yes	Date	<u> </u>
Implementing on Schedule?	<input type="checkbox"/> No	<input type="checkbox"/> Yes		
Certified Closed by P.E.	<input type="checkbox"/> No	<input type="checkbox"/> Yes	Date	<u> </u>

*Note: Closure was performed in accordance with Agreed Final Judgement No-116345, dated December 13, 1982, District Court of Jefferson County. The closure plan submitted on 4/26/83 (Document 4) was reviewed by TDWR on 5/13/83 (Document 5). A report documenting all closure activities and certifying closure was prepared by Chemall's consultant, Pilko & Associates, Inc., and submitted on 7/30/84 (Document 6).

RCRA ACTIVITIES AS OF NOVEMBER 8, 1985

Generator	/X/ No	/ / Yes	Accumulation time <90 days
			— Container — Tank
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			
29			
30			
31			
32			
33			
34			
35			
36			
37			
38			
39			
40			
41			
42			
43			
44			
45			
46			
47			
48			
49			
50			
51			
52			
53			
54			
55			
56			
57			
58			
59			
60			
61			
62			
63			
64			
65			
66			
67			
68			
69			
70			
71			
72			
73			
74			
75			
76			
77			
78			
79			
80			
81			
82			
83			
84			
85			
86			
87			
88			
89			
90			
91			
92			
93			
94			
95			
96			
97			
98			
99			
100			

Transporter \overline{X} No \overline{Y} Yes

Storage in tanks \overline{X} No \overline{Y} Yes

Storage in containers	/X/ No	/ / Yes
-----------------------	--------	---------

Treatment Other Than / \bar{X} / No
Land Disposal

Codes: $\overline{1/1}$ T01 $\overline{1/1}$ T03 $\overline{1/1}$ T04

Comments:

RCRA ACTIVITIES AS OF NOVEMBER 8, 1985
(Continued)Land Disposal ☒ NoCodes: ☐ D80 ☐ D81 ☐ D83 ☐ T02
☐ S03 ☐ S04 ☐ T03 ☐ T04Comments: _____

_____UIC (D79) ☒ No ☐ YesExemptions ☒ No ☐ YesElementary
Neutralization Unit ☐ No ☐ Yes Units: _____Recycle ☐ No ☐ Yes Units: _____Small Quantity
Generator ☐ No ☐ Yes Units: _____Other Exemption ☐ No ☐ Yes Units: _____Comments: _____

LIST OF DOCUMENTS

1. Title Notification of Hazardous Waste Activity
Author B. L. Owen, Vice President - Operations Plant Manager
Date 8/15/80 Number of Pages 2
Reviewed _____ Copied X
Subject Relevance _____

2. Title TDWR - Part A Permit Application
Author B. L. Owen and Ruth Richey
Date 8/14/80 Number of Pages 18
Reviewed _____ Copied X
Subject Relevance Operations included the production of "Chain" oil and chlorinated paraffins. Wastes: caustic scrubber waste and slop oil emulsion solids.
3. Title U.S. EPA Part A Permit Application
Author B. L. Owen
Date 11/17/80 Number of Pages 6
Reviewed _____ Copied X
Subject Relevance Listed S01 - container storage and T02 - surface impoundment. Wastes: oils and waxes containing HCl, slop oil emulsions, scrubber waste (caustic) and toxaphene.
4. Title Closure Plan
Author Richard F. Smullen, Pilko & Associates, Inc.
Date 4/26/83 Number of Pages 8
Reviewed _____ Copied X
Subject Relevance Submitted to TDWR

LIST OF DOCUMENTS (Continued)

5. Title Review of Closure Plan for Chemall's Existing Wastewater Treatment Pond
Author Robert Fleming, TDWR
Date 5/13/83 Number of Pages 2
Reviewed _____ Copied X
Subject Relevance Final closure date was extended due to weather, made various comments and asked for some additional information.
6. Title Chemall, Inc. - Agreed Final Judgement No-116345 - Closure
Author Richard Smullen, Jr., P.E., Pilko & Associates
Date 7/30/84 Number of Pages 10
Reviewed _____ Copied X
Subject Relevance Documents all remedial activities in accordance with agreements with TDWR and EPA. This document serves as Chemall's P.E. certification of closure according to Robert Cogliandro.
7. Title 3007 Letter
Author Allyn M. Davis, U.S. EPA
Date 10/31/85 Number of Pages 3
Reviewed _____ Copied X
Subject Relevance _____
8. Title Letter transmitting AOE and AOE attached
Author Brian Davis
Date 10/22/85 Number of Pages 3
Reviewed _____ Copied X
Subject Relevance _____

LIST OF DOCUMENTS (Continued)

9. Title Response to 3007 Letter
Author Brian Davis, Chemall
Date 11/5/85 Number of Pages 1
Reviewed _____ Copied X
Subject Relevance Stated that the surface impoundment was closed and that Chemall doesn't "receive, store, create, or treat" hazardous waste.
10. Title Lab Analysis of Cuprous Chloride Floor Sweepings
Author Rhonda Redd, Browning-Ferris Industries
Date April 23, 1986 Number of Pages 2
Reviewed _____ Copied X
Subject Relevance Shows that the floor sweepings are nonhazardous
11. Title Toxaphene Analysis of Closed Surface Impoundment and Old Spray Cooling Pond,
Author Texas Environmental Services, Inc.
Date 3/14/86 Number of Pages 4
Reviewed _____ Copied X
Subject Relevance _____
12. Title _____
Author _____
Date _____ Number of Pages _____
Reviewed _____ Copied _____
Subject Relevance _____

USE SEPARATE SHEET FOR EACH UNIT

HAZARDOUS WASTE LAND DISPOSAL UNIT DESCRIPTIONUnit No. 1 of 1

1. Facilities Name of Unit: Wastewater Treatment Pond
2. Purpose/Mode of Operation: Spray evaporation pond for caustic scrubber wastewater generated from the manufacturing of chlorinated paraffins.
This pond also received rainwater runoff from an area of the facility where toxaphene was manufactured by a previous owner during the 1970s.
3. Process Code: T02
4. Design Capacity: unknown
(Cite Verification) Part A Application to TDWR (Document 2)
Volume approximately 150,000 to 250,000 gallons
Rate 1,000 gpm
Depth of unit _____
Depth to ground water _____
5. Date of Existence: Prior to 1973
(Cite Verification) Statement by Brian Davis, Plant Manager

6. Dates of Last Hazardous and/or Nonhazardous Waste Addition: September 1980
(Cite Verification) Brian Davis stated that September 1980 was the last time chlorinated paraffins were manufactured. Therefore, no additional waste was added after September 1980.

7. Closure Plan Submittal Date: 4/26/83
8. Hazardous Waste Code(s) Handled: U224, D002
(Cite Verification) Describe: U224-toxaphene - Brian Davis stated that the surface impoundment was contaminated with toxaphene and Chemall's Part A Applications (Document 2 and 3) cited the D002 waste.

Unit No. _____ of _____

9. Non-hazardous Waste Handled: None

10. Provide Narrative of History of Operation Since 11-19-80; Cite References:

In 1971, Bison Chemical owned the facility. Then in 1973, Riverside Chemical,
a subsidiary of Cook Industries bought the facility. These two companies
manufactured toxaphene and chlorinated waxes. Rainwater runoff from the
toxaphene production area contributed to the toxaphene contamination of the
surface impoundment.

In 1977, Chemall bought the facility and used the surface impoundment to
spray-evaporate caustic scrubber solution from the manufacturing of chlorinated
paraffins until September 1980 and has never used the surface impoundment since
then. The surface impoundment has been closed according to an Agreed Final
Judgement No-116345, dated December 13, 1982, District Court of Jefferson
County. P.E. Certification of closure was submitted on 7/30/84 (Document 6)
see page C-4).

11. Field Observations: _____

USE SEPARATE SHEET FOR EACH UNIT

SWMU DESCRIPTION

Unit No. 1 of 3

1. Name of Unit: Old Spray Cooling Pond
2. Purpose/Associated Processes: Inactive - Before 1978, the pond was used
as a cooling water pond. Chemall used the pond for storage of fresh water
pumped from wells to be used for process water. Then in 1983, Chemall
installed a tank to hold process water and the pond was not used.
3. Type/Amount of Waste Received: See above.
4. Field Observation: The banks of the pond have a black sludge layer.
Freeboard is about 2 feet, however it is evident that the pond has been
close to overtopping. The liquid contained in the pond is a dark coffee
color with an intermittently oily sheen. The drainage ditch adjacent to
the pond contains standing water also with a thin oily sheen.

USE SEPARATE SHEET FOR EACH UNIT

SWMU DESCRIPTION

Unit No. 2 of 3

1. Name of Unit: Pond 1

2. Purpose/Associated Processes: Receives runoff from the drainage
ditches bordering the plant site. Water is collected here and a polymer
is added.

3. Type/Amount of Waste Received: Rainwater runoff, flow varies

4. Field Observation: Presently 4-5 feet deep. Clay lined surface impoundment.

USE SEPARATE SHEET FOR EACH UNIT

SWMU DESCRIPTION

Unit No. 3 of 3

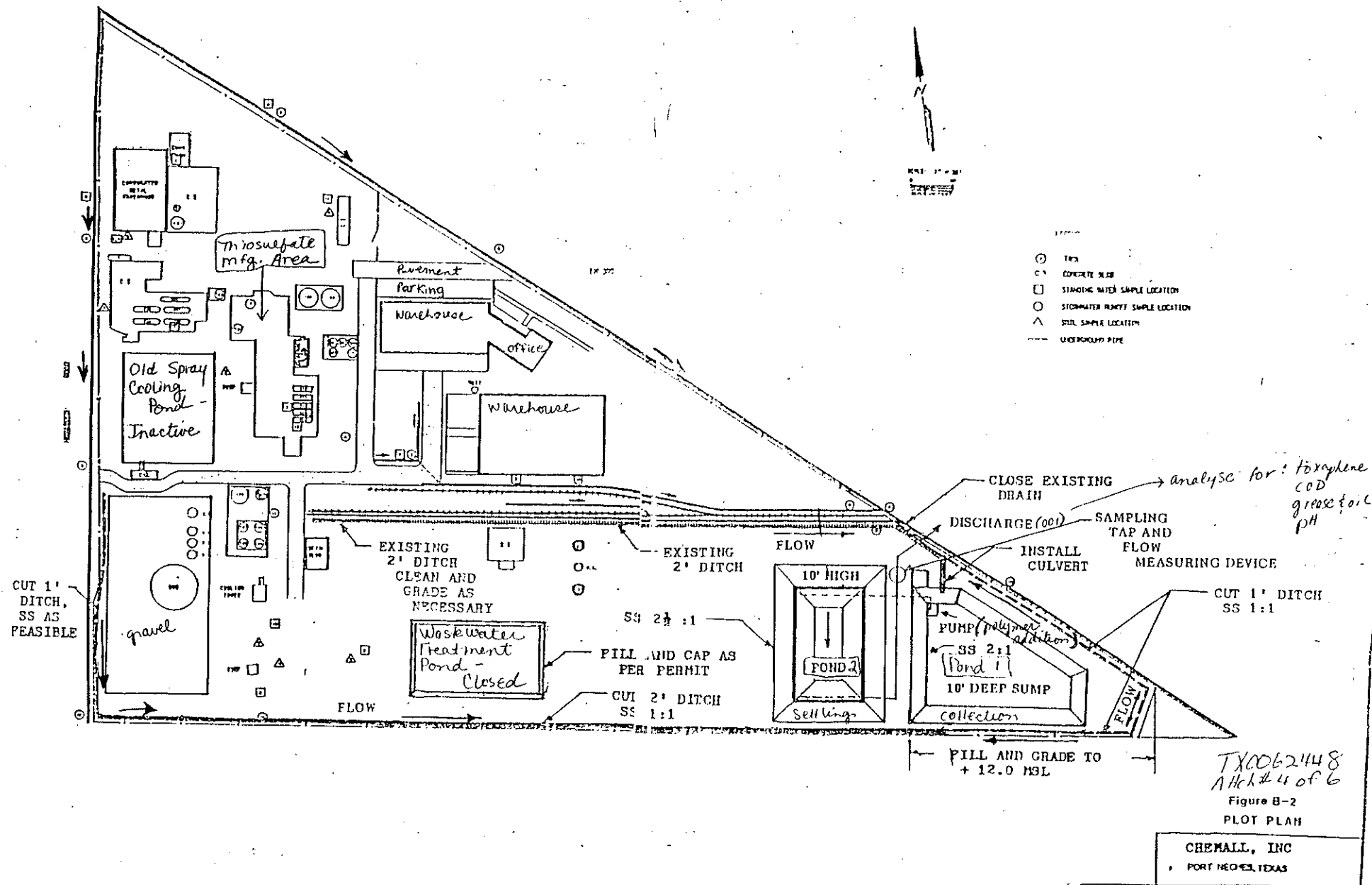
1. Name of Unit: Pond 2

2. Purpose/Associated Processes: Used to settle the wastewater from

Pond 1. Effluent is monitored for toxaphene, COD, oil and grease and pH.

3. Type/Amount of Waste Received: Flow from Pond 1 (rainwater runoff)

4. Field Observation: Surface impoundment is clay lined and above ground level.





CHEMALL, INC.

5500 STATE HIGHWAY 366 AT HOGABOOM ROAD • PORT NECHES, TEXAS
P.O. BOX 309, GROVES, TEXAS 77619 • 409-727-1471

July 10, 1986

PRC Engineering
Suite 600
303 East Wacker Drive
Chicago, Ill 60601

Attn: Susan Burns

Dear Ms. Burns:

Enclosed are the data sheets you requested. We are still looking for the missing data on the sludge toxaphene analysis. When we find it we will forward a copy to you.

If you have any further questions please feel free to contact us.

CHEMALL, INC.

Richard Metts
Richard Metts
Construction Supervisor

RM/blc

Metal Analysis of Pond Sludge

(waste water
treatment
pond)

Cadmium	.02 ppm
Chromium	25 ppm
Lead	1.4 ppm
Silver	7.02 ppm
Copper	1400 ppm
Selenium	1.4 ppm



TEXAS ENVIRONMENTAL SERVICES, INC.

1045 Boston Avenue
Nederland, TX 77627
(409) 727-6839

617 West Sterling
Baytown, TX 77520
(713) 427-3162

REPORT OF ANALYTICAL SERVICES

Sample Source :See Below
Date Collected:03/04/86

P.O. Number :8551
Invoice Number:23010

Client:Chemall
P.O. Box 309
Groves, TX 77619
Attn: B.Phyllis

Collected By :Client
Report Date :03/19/86
Date Received :03/04/86
Data Number :030586.7
Date Analyzed :See Below

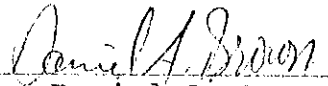
ANALYSIS REFERENCE:STANDARD METHODS FOR THE EXAMINATION OF WATER AND
WASTEWATER, 15th EDITION, APHA, AWWA, WPCF, 1980.

Sample Source	Date Collected	Toxaphene, ug/g = ppm
Cooling Pond	03/04/86	<2
Upper Cap 0 To 6"	03/04/86	<2
Bottom Cap 6" To 1'	03/04/86	120
366	03/04/86	110

Date Analyzed: 03/18/86
Time Analyzed: 1000
Analyst : KR

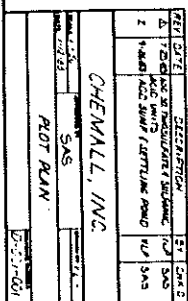
SAMPLE COLLECTION, PRESERVATION AND CONTAINER COMPLY WITH EPA REGULATIONS
IN "FEDERAL REGISTER", VOL. 49, NO. 209 (FRIDAY, OCTOBER 26, 1984).

ANALYSIS NUMBER:86-051-036


Daniel A. Brown
Vice President

366 44-1986

UPPER CAP SAMPLE	LOWER CAP SAMPLE
0 To 6"	6 To 12"



Cuprous Chloride floor Sweepings


BROWNING-FERRIS INDUSTRIES
 HOUSTON LABORATORY

INITIATION REPORT

 BFI LAB NO: 33938
 RE: CHEMALL; PORT NECHES, TX.

DATE: April 23, 1986

Test Performed Test Procedure

<u>X</u>	Radioactivity, exposure dose, milliroentgen/hour. Results: <u><0.05</u>
<u>X</u>	Characteristic of Ignitability as per 40 CFR 261.21. Results: <u>Negative</u>
<u>X</u>	Reaction when mixed with water. Results: <u>None Detected -- 99% Insoluble</u>
<u>X</u>	Reaction when mixed with a 10% wt. solution of HCl. Results: <u>Gases Liberated; 95% Insoluble</u>
<u>X</u>	Reaction when mixed with a 10% wt. solution of NaOH. Results: <u>None Detected -- 99% Insoluble</u>
<u>X</u>	Reaction when exposed to air. Results: <u>None Detected</u>
<u> </u>	Reaction when mixed with oil/solvent. Results: <u> </u>
<u>X</u>	Characteristic of Reactivity as per 40 CFR 261.23. Results: <u>Sulfide <5 ppm; Cyanide <2 ppm;</u>
<u> </u>	Presence and/or concentration of free liquids, Paint Filter Liquids Test, Method 9095, USEPA, SW-846. Results: <u> </u>
<u> </u>	Unconfined compressive strength, Pocket Penetrometer. Results, ton/ft ² : <u> </u>

This data is the product of the evaluation of BFI 33938 reported to be a representative sample of the waste material described on the BFI Waste Characterization Data Sheet assigned the BFI Waste Code TX/515/860421/33938. The attached waste disposal recommendation is based upon a review of the information provided by the generator and an assessment of the referenced sample. This recommendation is contingent upon receipt at the disposal facility of waste material essentially equivalent in chemical and physical properties to that defined by the above mentioned waste stream.

BFI HOUSTON LAB GROUP

Rhonda R. Redd, Technical Rep.

TMM/pc

DB-1

REV. 5/85



BROWNING-FERRIS INDUSTRIES

HOUSTON LABORATORY

PRETREATMENT AND DISPOSAL RECOMMENDATION

Date April 23, 1986

BFI 33938 Source CHEMALL; PORT NECHES, TX.

1. Sample Description: Liquid Sludge Solid X Mix Color Green
 Number of Phases (% v/v of each) Odor None

~~XX~~ pH (5% wt. Slurry) 4.6 Density 147 ~~(lb/cu. ft.)~~ Flash Point °F Total Solids % w/w

Safety Precautions:

Avoid Breathing Vapors Dust Avoid Skin and Eye Contact X

Toxicity:

2. Pretreatment:

 A. Phase Separation B. pH Adjustment C. Oxidation/Reduction D. Other

Comments:

3. Disposal Recommendation:

 A. Solidification: Volume percent of Original Waste

1. Kiln Dust Fly Ash Other

a. Ratio of Absorbent to Waste w/w b. Reaction upon mixing

c. Volume increase Times original. See attached leachate data

d. Final Disposal: (1) Sanitary

(2) Secure

 B. Deep Well Disposal: Volume percent of Original Waste

1. Calcasieu 2. Odessa 3. Other See attached Deep Well Analysis

 Subsurface inject the liquid waste into the receiving basin.

 C. Incineration at a BFI/CECOS approved subcontract facility: Volume percent of Original Waste

X D. Direct Landfill Burial: Volume percent of Original Waste 100% in drums

(1) Sanitary (2) Secure X- Livingston See attached analysis X

 The waste is to be solidified on the generator's site and placed in drums prior to shipment for disposal.

X Approved for ~~bulk and~~ containerized disposal: Drums ~~XXXXXX~~

X Containers must be completely filled, properly sealed and labeled, and contain only solids.

 E. Other:

 Crush and bury the empty containers in a BFI/CECOS approved landfill.

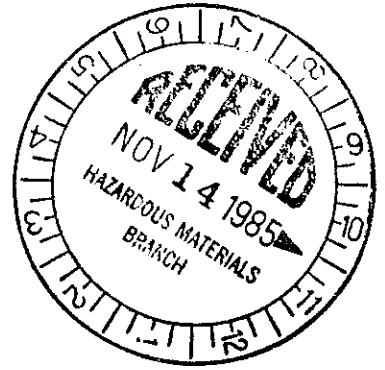
Comments: Segregate from acidic wastes.

Rhonda R. Redd



CHEMALL, INC.

5500 STATE HIGHWAY 366 AT HOGABOOM ROAD • PORT NECHES, TEXAS
P.O. BOX 309, GROVES, TEXAS 77619 • 409-727-1471



TX 00897 92543

November 5, 1985

United States Environmental Protection Agency
Region VI
1201 Elm Street
Dallas, Tx 75270

Dear Sirs:

We have one facility which was a pond which was closed and filled under court direction and administered by TDWR in 1981. At this time the plant manufactures Sodium Thiosulfate, Copper chlorides and Copper iodide. No hazardous waste is received, stored, created or treated. We have asked to rescind the hazardous waste permit, which had been applied for by accident.

In answer to your request for information please find:
(Question 1 and 2)

- a) A copy of the legal statement to the county clerk with respect to the closure of the pond.
- b) A plot plan showing the above.
- c) An affidavit to say that we are no longer storing, processing, disposing of hazardous waste.

(Question 3)

- a) With regard to the plan for closure this was negotiated in court and the compliance was monitored by TDWR.

(Question 4)

- a) No land disposal facility existed.
- b) No liquid or solid per month was disposed of. The pond had not received hazardous waste since 1980.

Sincerely,

Brian Davis
Brian Davis

RECEIVED SAW-HE

NOV 1 1985

BD/blc



CHEMALL, INC.

5500 STATE HIGHWAY 366 AT HOGABOOM ROAD • PORT NECHES, TEXAS
P.O. BOX 309, GROVES, TEXAS 77619 • 409-727-1471

November 21, 1985

Texas Water Commission
P.O. Box 13087 Capitol Station
Austin, Tx 78711

Dear Sirs:

We have not generated any hazardous waste in 1984 or 1985, and do not anticipate to generate any in the future. Based on discussion with Mr. Hatton at the Texas Water Commission, I am requesting that we be permitted to report only when hazardous material has to be discharged, rather than monthly.

Yours sincerely,

Brian Davis
Brian Davis

BD/blc

*Called Mr. Davis 12-5-85 9:50 and explained
how the fee was assessed, and he said they might
generate heavy costs after 9-1-85 therefore he paid
the fee and had no problems with it. Jim*

30446



CHEMALL, INC.

5500 STATE HIGHWAY 366 AT HOGABOOM ROAD • PORT NECHES, TEXAS
P.O. BOX 309, GROVES, TEXAS 77619 • 409-727-1471

NOV 8 1985

October 22, 1985

Texas Department of Water Resources
P.O. Box 13087
Capitol Station
Austin, Tx 78711

Attn: Jay Snow

Dear Sir:

With regard to your letter of June 16, 1985, regarding the part B, of the Hazardous Solid Waste Amendments, none of the processes in the original application are now permitted, and no Toxaphene has been seen above the detectable limits in our run off water over the last year.

The processes which we are currently operating are for inorganics; Sodium Thiosulfate, copper chlorides, and iodides. We do not create solid wastes of either hazardous or non hazardous variety.

Since I believe that we are not storing nor processing hazardous waste, I am submitting a request for exclusion of Hazardous Waste permitting requirements.

Yours sincerely,

Brian Davis

BD/blc

encl.

AFFIDAVIT OF EXCLUSION FROM HAZARDOUS WASTE PERMITTING REQUIREMENT

Registration No. 30446
Application No. 10237
(Dept. Use Only)
Facility Name Chemall, Inc.
County of Jefferson

JUN 27 1985

Brian Davis being duly sworn, deposes and says:
I am Plant Manager of Chemall, Inc.
Title (Owner or Principal Officer) Facility Owner
5500 Hwy 366, Port Neches, Texas
and Address

This affidavit is being executed for the purpose of notifying the Executive Director of the Texas Department of Water Resources that the named facility does not require a hazardous waste permit because:

Check appropriate box(es):

- ☒ No hazardous waste is stored, processed or disposed on-site
- ☐ The facility qualifies for the "Accumulation Time" storage exclusion of Texas Administrative Code, Section 335.69
- ☐ The facility qualifies for the "Small Quantity Generator" exclusion of Texas Administrative Code, Section 335.2(e)
- ☐ The facility qualifies for the "Elementary Neutralization Unit" exclusion of Texas Administrative Code, Section 335.2(f)
- ☐ The facility qualifies for the "Wastewater Treatment Unit" exclusion of Texas Administrative Code, Section 335.2(f)
- ☐ Other (Explain with an attachment and reference TDWR rule)

[Signature]
Signature

Sworn to before me this
17th day of October, 1985.

Becky A. Hanna
Notary Public in and for

Jefferson County, Texas

My commission expires 06/04/89

Chenault
10-31

SOLID WASTE SECTION ROUTE SLIP

_____ Jay	<u>DK</u> Ray
_____ Dan	_____ Elaine
_____ Richard	_____ George
_____ Jim	_____ Marilee
_____ Barb	_____ Jeff
_____ Laura	_____ Kari
_____ Jo Anne	
_____ Minor	_____ Kelly
_____ Gerry	_____ Joe
_____ Bob	_____ Kathy
_____ Jesse	_____ Cindy
_____ Dick	_____ Randy
_____ Cesar	
_____ Rex	_____ Dwight
_____ Hope	_____ Alice
_____	_____ Robin
_____	_____ Phil
_____	_____ Bernie
_____	_____ Scott

① Check the file for part
h.w. generation and
management - particularly
whether the surface impound-
ment received h.w. +
if so, when?

Central Records
Your Files
SW Section Files
Copy to: _____

② Process the exclusion
+ return it w/ file to me.

thanks



30446

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VI
INTERFIRST TWO BUILDING, 1201 ELM STREET
DALLAS, TEXAS 75270

OCT 31 1985

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Chemall Inc.
P. O. Box 307
Groves, Texas 77619

RE: Request for Information Pursuant to §3007 of the Resource
Conservation and Recovery Act, 42 U.S.C. §6927

Dear Owner/Operator:

The Environmental Protection Agency (EPA) is hereby advising you that the Resource Conservation and Recovery Act of 1976 (RCRA) has been amended by the Hazardous and Solid Waste Amendments of 1984 (the Amendments), and in particular, is informing you of a new provision known as the loss of interim status provision. The purpose of this letter is to provide additional guidance relative to the loss of interim status provision and to request information regarding your operations before and after November 8, 1985.

The loss of interim status provision states:

(2) In the case of each land disposal facility which has been granted interim status under this subsection before the date of enactment of the Hazardous and Solid Waste Amendments of 1984, interim status shall terminate on the date [November 8, 1985] twelve months after the date of the enactment [November 8, 1984] of such Amendments unless the owner or operator of such facility-

(A) applies for a final determination regarding the issuance of a permit under subsection (c) for such facility before the date twelve months after the date of the enactment of such Amendments; and

(B) certifies that such facility is in compliance with all applicable groundwater monitoring and financial responsibility requirements.

The EPA's interpretation of the requirement under this provision is published at 50 Federal Register 38946 (September 25, 1985), a copy of which is enclosed. Please read and follow this closely. In order for

you to continue to place wastes in any land disposal unit at your facility on and after November 8, 1985, you must submit: (1) A Part B operating permit application, and (2) a certification of compliance with all applicable groundwater monitoring and financial responsibility requirements prior to November 8, 1985. Certification is allowed on a unit-by-unit basis. The Part B application should be mailed or delivered by November 8, 1985, to:

Mr. Minor Hibbs, Chief
Hazardous and Solid Wastes
Permits Section
Texas Water Commission
1700 N. Congress Ave.
Austin, Texas 78701

The certification should be mailed by November 8, 1985, to:

U.S. Environmental Protection Agency and	Mr. Minor Hibbs, Chief
Hazardous Waste Management Division	Hazardous and Solid Wastes
InterFirst II Building - 28th Floor	Permits Section
1201 Elm Street	Texas Water Commission
Dallas, Texas 75270	1700 N. Congress Ave.
Attn: Mr. William Rhea (6H-HO)	Austin, Texas 78701

The owner/operator of a facility may certify compliance only if the facility or units for which interim status is retained is in physical compliance. Because this is a Federal statutory provision, an outstanding order issued by any agency with a compliance date on or beyond November 8, 1985, does not relieve the owner/operator of the obligation to be in physical compliance by the date the certification is due. You may not interpret or rely on any order or compliance schedule therein as an extension of the November 8, 1985, deadline. Moreover, difficulties in achieving compliance, such as obtaining insurance, will not be considered as an excuse or exemption from the requirement of physical compliance.

If you do not certify compliance with groundwater monitoring and financial responsibility requirements, and you do not submit a Part B permit application by November 8, 1985, you must cease to place wastes into the land disposal units in question by that date and submit a closure plan for these units to the above addresses by November 23, 1985. This follows by operation of law and does not require notice from EPA.

You are hereby required, pursuant to the authority of §3007 of RCRA, 42 U.S.C. §6927, to report to EPA the following additional information regarding hazardous waste land disposal units that had interim status on or before November 8, 1985, and/or received hazardous waste after November 19, 1980. In particular, you are to submit the information requested in Enclosure 2 according to the schedule specified in

Enclosure 2. Each submission must identify the facility by name, mailing address, facility location, and EPA RCRA I.D. number. Identify the information request number or repeat the request, include a self-explanatory and complete response, and date and sign each response.

You may, if you desire, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 CFR §2.203(b). You should read the above-cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim. Information covered by such a claim will be disclosed by EPA only to the extent, and by the means of the procedures, set forth by 40 CFR Part 2, Subpart B. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you.

Please forward the additional information requested to:

U.S. Environmental Protection Agency
Hazardous Waste Management Division
InterFirst II Building - 28th Floor
1201 Elm Street
Dallas, Texas 75270
Attn: Mr. William Rhea (6H-HO)

Failure to comply with the above request within the time frame specified may result in an enforcement action by EPA under the authority of §3008 of RCRA, including the assessment of penalties. You should also be aware that knowingly falsifying any information provided pursuant to this request is a criminal violation under §3008(d)(3) of RCRA, and other provisions and may result in fines and imprisonment.

If you have any questions with regard to the above, or should you need further clarification regarding your response to this letter, please contact Mr. William Rhea of my staff at (214) 767-9731.

Sincerely,

Allyn M. Davis
Director
Hazardous Waste Management Division

Enclosures

cc: Minor Hibbs
Texas Water Commission

Texas Department of Water Resources

INTEROFFICE MEMORANDUM

TO : Bryan Dixon, Chief, Solid Waste and Spill Response, DATE: September 24, 1984
Enforcement and Field Operations

THRU :

FROM : Tim Chaney, Environmental Quality Specialist, District 6

SUBJECT: Chemall, Inc., Registration No. 30446
Industrial Solid Waste Compliance Monitoring Inspection
Enforcement Action Request of 8/13/79, Addendum Report

RECEIVED
SEP 24 '84
ENFORCEMENT AND
FIELD OPERATIONS

On August 22nd and September 18, 1984 Texas Department of Water Resources (TDWR) District 6 representative Tim Chaney conducted an industrial solid waste compliance inspection at Chemall, Inc. During the inspection numerous violations of the Texas Administrative Code (TAC) Industrial Solid Waste Rules, the Texas Water Code, and the Agreed Final Judgement (No. D116345, Jefferson County District Court, 136 Judicial District, dated 12/13/82) were observed. These violations are:

1. TAC Rule No. 335.4, and Judgement No. D116345--Drums in the company's drum storage area in the northwest corner of the plant site are corroded almost completely and the majority of the contents (cuprous chloride) have spilled onto the floor of the open warehouse. The freeboard on the company's waste storage pond is inadequate to prevent overtopping of the dike by the wastewater from the Thiosulfate process area. The company piled dirt, some of which was contaminated with toxaphene (EPA hazardous waste No. D015), on the cap of the pond which was closed in July 1984. In removing the dirt the approved slope and vegetative cover were destroyed. (See attachment D)
2. Rule No. 335.5, and Judgement No. D116345--The company has not provided a waste description in the county deed recordation of the closed waste pond where toxaphene contaminated sludges were landfilled.
3. Rule No. 335.6, and 335.43--The company has not notified the Executive Director in writing of a drum storage area for storage of waste cuprous chloride (a class I non-hazardous waste) a surface impoundment, and the wastewater (from the Thiosulfate process area) stored therein (not classified), and a waste pile for storage of dirt contaminated with toxaphene (EPA hazardous waste No. D015). The company is in violation of many other TAC Rules applicable to management of hazardous waste in piles.

Bryan Dixon
Page 2
September 24, 1984

4. Rule No. 335.62--The company had not made a hazardous waste determination on the wastewater from the Thiosulfate process area nor the leachate and rainfall run-off from the hazardous waste pile. The hazardous waste pile was removed on 9/5/84.
5. Texas Water Code--The company has not been reporting spills. During the 9/18/84 inspection a discharge of wastewater from the Thiosulfate process area was observed. Discharges have also occurred from the waste surface impoundment.

If it is determined that the wastewater from the Thiosulfate processing area is hazardous, then the company is in violation of all TAC Rules governing storage of hazardous waste in surface impoundments. If it is determined that the leachate and/or run-off from the hazardous waste pile is hazardous, then the company is in violation of TAC Rule 335.304.

It is requested that the violations delineated above be added to the Enforcement Action Request dated August 13, 1979.

Approved


Harry D. Boudreaux

Signed


Tim Chaney

Attachments
TC/js

3044P

PILKO & ASSOCIATES, INC.

July 30, 1984

Mr. Michael Dick
Texas Department of Water Resources
P.O. Box 13087
Capitol Station
Austin, TX 78711

SUBJECT: Chemall, Inc. - Agreed Final Judgment No. D-116345 - Closure

I have recently received the final information from Chemall, Inc. on the closure of the old waste pond, and initial performance data on the new stormwater treatment system. In accordance with our final agreements with TDWR and EPA, I have prepared this letter to document all remedial activities by Chemall.

STORMWATER TREATMENT

On March 27, 1984, I made a final inspection of the treatment facility. Only minor additional construction was required to bring the facility to its design requirements. These activities included improved erosion protection, grouting of two concrete inlets to the collection sump, and reseeded some areas.

In July of 1984 sufficient stormwater was collected to result in a discharge from the system. Chemall reports that the discharge had the following characteristics:

<u>Parameter</u>	<u>Concentration</u> (Mg/l)	<u>Limitation</u> (Mg/l)
Toxaphene	<.005	0.04
Copper	<0.1	2
Oil & Grease	<1.0	15
Chlorinated Hydrocarbons	<.001	3
Ammonia as N	<1.0	10
COD	114	150

The effluent from the new stormwater treatment system is discharged through outfall 001 and is well within permit limitations.

POND CLOSURE

The old wastewater treatment pond was closed in accordance with the closure plan submitted on April 26, 1983.

The first phase of the pond closure was the discharge surface water in accordance with Temporary Order No. 83-40E issued November 21, 1983. Prior to discharge, the pond was circulated using a 1,000 gpm pump and water neutralized from pH 9.5 to pH 8.3 using sulfuric acid. After neutralization, the pond was treated with approximately 7 Mg/l of Nalco 7103, a settling aid. Pumping was continued to enhance mixing. The pond was then allowed to settle for 48 hours to remove suspended solids from the water.

The pond was discharged at a rate ranging from 50 to 65 gpm. The discharge was started at 6:30 a.m. on December 15, 1983 and completed at 11:30 p.m. on December 18, 1983. Samples were taken approximately every eight (8) hours. The results of analysis completed on samples are shown in Exhibit 1.

Following removal of free water, the existing pond levees were pushed into the empty pond and mixed with residual sludges. Approximately 240 tons of flue dust was added to the sludge. Sludges, levee soils, and flue dust were mixed with a backhoe. The flue dust removed all remaining free water from the sludge.

During the construction of the new stormwater treatment system, Stratum 2 soils were stockpiled for use as a clay cap on the pond. Approximately 2,500 cubic yards of material were required to construct the cap. The depth of the cap is approximately 4.0 feet. The compacted cap material meets the characteristics specified by the Department of Water Resources.

- o Permeability less than or equal to 1×10^{-7} centimeters per second
- o Percent passing number 200 sieve greater than or equal to 30
- o Liquid limit greater than or equal to 30
- o Plasticity index greater than or equal to 15

The clay cap has been constructed with a slope of approximately 2 percent from the center of the pond to its old perimeter. From the perimeter to grade level the cap is sloped approximately 5 percent for a distance of approximately 20 feet.

The clay cap was covered with 6 to 8 inches of top soil and seeded with Bermuda grass.

Attached Exhibit 2 is the engineering drawing P-102 from the closure plan. Closure of the pond was complete as indicated in the drawing.

LEGAL DESCRIPTION

The delay in getting this letter to TDWR was caused by the attorney preparing the legal description for the waste site. His original submission to the county contained an error that required correction. The attached Exhibit 3 contains the attorney's final submission to the Jefferson County Real Property Records, the legal description of the site, and acknowledgement of receipt of this information by the County Clerk.

DITCH CLEANUP

The final aspect of the closure plan was to clean plant boundary ditches and remove contaminated soil to offsite disposal. Prior to installation of the new treatment system, the highest concentration of toxaphene was recorded in outfalls leading to the ditch along Hogaboom Road. Soils from this ditch have been completely removed and shipped to offsite disposal.

Plant ditches along F.M. 366 contain pockets of contamination. The ditch from the railroad gate to the southeast corner of the plant have been cleaned and sent to offsite disposal. The ditch from Hogaboom Road to the railroad gate has been sampled, but results of analyses have not yet been received from the laboratory. Any pockets of contamination spotted in this area will be removed and also sent to offsite disposal.

Exhibit 4 shows the plant ditches and cleanup efforts to date.

Based upon the past history of discharges and plant operations, Chemall anticipates acceptable concentration of toxaphene in remaining plant ditches. The results of analyses from the ditches will be forwarded to TDWR shortly as received.

Chemall appreciates the efforts of TDWR in working with the Company in resolving this problem. We believe the final solution provides the maximum benefits to both the public and the Company.

For PILKO & ASSOCIATES, INC.



Richard F. Smullen, Jr., P.E.
Vice President

RFS:sr

Attachments

cc: Ben Owen - Chemall, Inc.
Charles Cogliandro
Mike Moore - TDWR, District 6

EXHIBIT 1**WATER QUALITY ANALYSES - CHEMALL POND CLOSURE**

<u>Date</u>	<u>Time</u>	<u>pH</u>	<u>Cu mg/l</u>	<u>Cr mg/l</u>	<u>TOC mg/l</u>	<u>TSS mg/l</u>	<u>Toxaphene mg/l</u>
12-15-83	11:00 a.m.	8.0	1	.5	39	1	.035
12/15/83	5:30 p.m.	8.0	1	.5	28	2	.037
12-16/83	1:30 a.m.	8.1	1	0.3	36	3	.033
12-16-83	11:00 a.m.	8.5	1	0.2	25	1	.008
12-16-83	5:00 p.m.	8.3	1	0.2	33	3	.024
12-17-83	1:00 a.m.	8.1	1	0.3	33	1	.008
12-17-83	10:00 a.m.	8.1	1	0.3	36	1	.040
12-17-83	5:00 p.m.	8.2	1	0.3	11	3	.028
12-18-83	1:00 a.m.	8.2	1	0.3	23	3	.023
12-18-83	10:00 a.m.	8.2	1	0.3	23	48	.036
12-18-83	5:00 p.m.	8.4	1	0.3	23	32	.029

Discharge was started on 12-15-83 at 6:30 a.m.

Discharge was stopped on 12-18-83 at approximately 11:30 p.m.

EXHIBIT 2
POND CLOSURE SPECIFICATIONS

EXHIBIT 3
LEGAL DESCRIPTION AND
FINAL FOR POND CLOSURE

NOTICE OF INDUSTRIAL SOLID WASTE DISPOSAL

STATE OF TEXAS §

COUNTY OF JEFFERSON §

Pursuant to the provisions of the Texas Administrative Code, Title 31, Section 335.5, Chemall, Inc. states that it maintains an industrial solid waste treatment and disposal facility in Jefferson County, Texas, described as follows:

That certain 0.606 acre tract of land being referred to as Waste Disposal Pond Site within the 14.19 acre tract of land having been conveyed to Jefferson Chemical Company, Inc. from American Cyanamid Company by deed dated February 13, 1959, and recorded in Volume 1150, Page 624 of the Deed Records of Jefferson County, Texas; said 14.19 acre tract described as being out of Lot 8, Block 8, Range C and Lot 1, Block 9, Range C of the Port Arthur Land Company Lands, Jefferson County, Texas; said 0.606 acre Waste Disposal Pond Site being more particularly described by metes and bounds as follows:

COMMENCING from an iron rod found at the intersection of the southwesterly right-of-way line of FM Highway 366, a 120-foot wide right-of-way, and the easterly right-of-way line of Hogaboom Road; said iron rod also being at the north corner of the said 14.19 acre tract;

THENCE South 08°03'15" West and along the said east right-of-way line of Hogaboom Road, and also along the west line of the said 14.19 acre tract, a distance of 868.16 feet to a point at the southwest corner of the said 14.19 acre tract;

THENCE South 81°27'40" East and along the south line of the said 14.19 acre tract, a distance of 380.00 feet to an angle point;

THENCE North 08°03'15" East and parallel with the said west line of the 14.19 acre tract, a distance of 30.00 feet to the POINT OF BEGINNING;

THENCE continuing North 08°03'15" East, a distance of 120.00 feet to a point at the northwest corner of the said 0.606 acre tract;

THENCE South 81°27'40" East and parallel with the said south line of the 14.19 acre tract, a distance of 220.00 feet to a point at the northeast corner of the said 0.606 acre tract;

THENCE South 08°03'15" West and parallel with the said west line of the 14.19 acre tract, a distance of 120.00 feet to a point at the southeast corner of the said 0.606 acre tract;

THENCE North 81°27'40" West and parallel with the said south line of the 14.19 acre tract, a distance of 220.00 feet to the POINT OF BEGINNING, and containing 0.606 acres of land.

The solid waste disposed of on the above-described tract is sediment from the chemical plant storm/process water impoundment basin which is classified by the Texas Department of Water Resources as Class I Non-Hazardous Industrial Solid Waste. Chemall, Inc., is the owner and operator of the facility and more specific information on the waste disposed of at the facility may be obtained from the Plant Manager of the Chemall, Inc., facility, P.O. Box 309, Groves, Jefferson County, Texas 77619.

EXECUTED this 14 day of May, 1984.

CHEMALL, INC.

BY: 

BEN OWEN, PRESIDENT

STATE OF TEXAS §

COUNTY OF JEFFERSON §

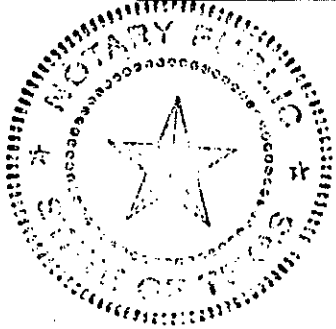
This instrument was acknowledged before me on
the 14th day of May, 1984, by Ben Owen, President of Chemall,
Inc., a Texas corporation, on behalf of said corporation.


NOTARY PUBLIC IN AND FOR THE
STATE OF TEXAS

J. D. EVANS
(Typed or Printed Name of Notary)

MY COMMISSION EXPIRES:

12-19-84



J. D. EVANS

My Commission Expires 12-19-84

FILED FOR RECORD

J. K. Betchel
COUNTY CLERK
JEFFERSON COUNTY, TEXAS

MAY 10 11 16 AM '84

AFTER RECORDING
RETURN TO:

MR. BEN OWEN
CHEMALL, INC.
P.O. BOX 309
GROVES, TEXAS 77619

STATE OF TEXAS

COUNTY OF JEFFERSON

I hereby certify that this instrument was filed on
the date and time stamped hereon by me and was duly
recorded in the Official Public Records of Real Property of
Jefferson County, Texas, on



MAY 18 1984

R L Ramey

COUNTY CLERK, Jefferson County, Texas

*Mr. Ben Owen
Chomall Inc
P.O. Box 309
Groves, TX 77619*

2, 3, 1
D TSD
RECEIVED
AUG 03 '83
ENFORCEMENT AND
FIELD OPERATIONS
HNF

Texas Department of Water Resources

INTEROFFICE MEMORANDUM

TO : Gary Schroeder, Chief, Solid Waste and Spill Response, Enforcement and Field Operations DATE: August 1, 1983

THRU :

FROM : Wesley Newberry, Environmental Quality Specialist, District 6

SUBJECT: Chemall, Inc., Registration No. 30446--Annual Solid Waste Compliance Inspection

On May 25, 1983 Texas Department of Water Resources District 6 representative Wesley Newberry conducted an annual solid waste compliance inspection at Chemall, Inc. (Registration No. 30446). A copy of the inspection checklist is attached.

Chemall, Inc. is a manufacturer of inorganic chemicals. The company generates one Class II waste and seven Class I wastes (see Attachment A). At times spillage of aluminum chloride and copper chloride may occur. The aluminum chloride that becomes contaminated is sent to Witco Chemical Company, Houston, for recycling. The copper chloride and copper oxide are sold to area recyclers (list to be submitted in a separate interoffice memorandum). The copper oxide is hydrolized in a 6,000-gallon tank and then dried. Chemall started using the tank in October 1982.

At the time of the inspection 20-30,000 gallons of oil (from Mobil, Registration No. 30587) was being stored on-site. When the oil is sold, the company will no longer be in the waste oil recycling business.

During the inspection the following deficiencies of the Texas Administrative Code were noted:

1. Section 335.6--The following amendments to the company's notice of registration are needed:
 - (a) Waste Sequences 002, 006, and 007 are no longer generated.
 - (b) Waste Sequence 008--Aluminum chloride is a reactive material and is therefore a hazardous waste.
 - (c) Drum storage area for Waste Sequence Nos. 008, 009, 010, and 011.
 - (d) Tank for storage of Waste Sequence 009.

Gary Schroeder
Page 2
August 1, 1983

2. Section 335.117--No personnel training records are maintained.
3. Section 335.153--The contingency plan is being revised and was not available for review.

During the inspection drums of heavy sludge (waste Sequence 010) and cuprous oxide (Waste Sequence 009) were being stored in a warehouse. No hazardous waste determination had been made (Violation of TAC Section No. 335.63). The drums of cuprous oxide were corroding and appeared to pose an imminent threat of leakage or spillage. The condition of the drums indicates the material is corrosive, thus a hazardous waste. Drums of this material were noted in the previous inspection (January 15, 1982), thus storage of hazardous waste without interim status or a permit (violation of TAC Section No. 335.43).

The company has an inactive impoundment basin that will be closed out by September 30, 1983. Closure plan has been submitted on April 26, 1983. During the inspection less than two feet of freeboard and evidence of overtopping of the dike were noted.

An enforcement action request was submitted by this office (dated July 6, 1983). It is therefore requested that the aforementioned deficiencies be added to the enforcement action request.

Approved:


Harry D. Boudreaux

Signed:


Wesley Newberry

WN/bk

Attachment

TEXAS DEPARTMENT OF WATER RESOURCES
Industrial Solid Waste Disposal Compliance Monitoring Inspection

Inspection Cover Sheet (see reverse side for checklist use and general instructions)

Compliant Texas Permit/Reg. No. 30446Noncompliant X EPA I.D. No. TXD089792543

Site Operator Information:

Name of Company Chemall, Inc.Company's Address P.O. Box 309Groves, Texas 77619Phone No. 409/727-1471Site Address 5500 Street, Highway 366 and Hogaboom Road, Port Neches, TexasPhone No. 409/727-1471County JeffersonType of Industry Manufacturer of inorganic chemicals

Indicate below Classes of Waste managed (Hazardous-H, Class I nonhazardous-NH, Class II-III)

Generator H,NH,IITransporter Small Quantity Generator Treatment Disposal Storage H,NH,II; 90 Day Exemption X

Site Information (T.S.D. facilities only)

1. Are facilities located outside the 100 year flood plain area? Yes
2. Describe land use within one mile Industrial, residential
3. Closed or abandoned facilities Surface impoundment--inactive, will be closed out by September 30, 1983

Inspection Information:

1. Inspector's Name & Title Wesley Newberry, Environmental Quality Specialist2. Inspection Date May 25, 19833. Inspection Participants Ben OwenApproved: *A.D. [Signature]*

District Supervisor

Signed: *Wesley Newberry*

Inspector

Date: *8/1/83*

Instructions for completing the Non-Major Compliance Monitoring Inspection Report (Solid Waste Generators)

This report and any other appropriate checklists are to be completed for the inspection of hazardous waste on-site and off-site activities, Class I nonhazardous waste on-site and off-site activities, and Class II waste on-site industrial solid waste activities. This form is not intended for reporting of special problem type solid waste inspections involving non-registered or non-permitted activities.

When completing the inspection report form and checklist, please type or print clearly.

1. Class I nonhazardous and Class II generators with facilities for on-site disposal requires: this cover sheet, Generators and Facilities Checklist and separate (possibly multiple) Checklists for all individual facilities. These will only be partially completed, with page(s) deletion or leaving blank spaces for hazardous waste questions.
2. The Generators and Facilities Checklist and all individual facilities checklists should include adequate drawings or sketches annotated to present an understanding of location and which checklist concerns which solid waste management activity(s) (not necessary to include waste generation source in the process operations).
3. Class II generators with all off-site disposal activities should be reported by I.O.M. only.
4. Inspection of Transporter (no on-site storage or processing) activities should be reported by I.O.M. only.
5. Inspection of Class I hazardous generators with periodic and infrequent shipper status may be reported by I.O.M. only. (Off-site disposal) - Attach this Inspection Cover Sheet to I.O.M.

Compliance Monitoring Inspection Report - Checklist Index

Group I

Inspection Cover Sheet
Generators Checklist
Facilities Checklist
Comments Sheet

Group II

Landfill Checklist
Surface Impoundments Checklist

Group II contd.

Land Treatment Checklist
Tanks Checklist
Chemical Physical and Biological
Treatment Checklist
Waste Pile Checklist
Incinerators Checklist
Thermal Treatment Checklist
Ground Water Monitoring Checklist
*Closure and Post Closure Checklist
Comments Sheet

All No answers should be addressed in the comments sheet.

*Note: Checklist for use with "Part A" permit applicant that has not submitted "Part B" application.

INDUSTRIAL SOLID WASTE

Non-Major Compliance Monitoring Inspection Report Generators and Facilities Checklist

Section A - Manifest

1. TDWR manifest is properly completed.

Yes ☒ No ☐ N/A ☐

Note: If generator is a small quantity generator, manifesting is the only pretransport requirement.

Section B - Hazardous Waste Determination

1. On a copy of the registration, note generated solid waste(s) listed in Part 261 Subpart D with "L" (listed) and solid waste(s) that exhibit hazardous characteristics (corrosivity, ignitability, reactivity, EP toxicity) with "C" (characteristic). *See Attachment A*
2. If notification or disposition of waste stream changes is not current, explain in comments sheet.

Section C - Recordkeeping and Reports

1. Generator maintains the required records and reports for 3 years.

Yes ☒ No ☐

Section D - General Facility Standards

1. Proof of deed recordation of on-site disposal facilities has been provided to the agency.

Yes ☐ No ☐ N/A ☐

2. All spills have been reported.

Yes ☐ No ☐ N/A ☒

NOTE: Attach a sketch of facilities. For all nonhazardous facilities do not complete the remainder of this Checklist. Use specific type facility checklists (from Group II form) and complete one checklist for each disposal facility.

STOP HERE IF FACILITY IS A SMALL QUANTITY GENERATOR.

Section E - Pretransport Requirements

1. Generator appears to have standard procedures for packaging, labeling and marking of hazardous waste.

Yes ☐ No ☐ N/A ☒

2. Accumulation Time - (May accumulate hazardous waste for up to 90 days without a permit).

- a. Each container used to temporarily store waste before transport is clearly dated.

Yes ☐ NO ☐ N/A ☒

b. Containers are labeled "Hazardous Waste" while being accumulated on-site.

Yes ___ No ___ N/A ☒

c. Containers are inspected for leakage or corrosion at least weekly.

Yes ___ No ___ N/A ☒

d. Containers holding ignitable or reactive waste are located at least 15 meters (50 feet) from the facility's property line.

Yes ___ No ___ N/A ☒

Note: If tanks are used, fill out checklist for tanks.

Section F - Personnel Training

1. Owner/operator maintains adequate Personnel Training Records at the facility.

Yes ___ No ☒ See comments

Section G - Preparedness and Prevention

1. Owner/operator has attempted to obtain agreements with police, fire departments, emergency response teams, emergency response contractors, and equipment suppliers, as appropriate.

Yes ☒ No ___

2. Emergency information is readily available to the emergency coordinator.

Yes ☒ No ___

Section H - Contingency Plan and Emergency Procedures

1. An adequate contingency plan is maintained at the facility.

Yes ___ No ☒ See comments

STOP HERE IF WASTE ACCUMULATES ON-SITE LESS THAN 90 DAYS

Section I - Waste Analysis

1. Facility has an adequate waste analysis plan.

Yes ___ No ☒

2. Facility provides adequate security.

Yes ___ No ☒

3. Facility has a sign with the legend "Danger - Unauthorized Personnel Keep Out".

Yes ___ No ___ N/A ☒

Section J - General Inspection Requirements

1. Facility has an adequate written inspection schedule (and plan).

Yes ___ No ☒

2. Owner/operator maintains an inspection log.

Yes ___ No ☒

Section K - Requirements for Ignitable, Reactive or Incompatible Waste

1. Owner/operator is familiar with proper separation and safeguards needed to prevent ignition or reaction of ignitable or reactive waste.

Yes ___ No ___

2. Owner has transferred waste from all containers leaking, bulging, or corroding.

Yes ___ No ___

Section L - Manifest System, Recordkeeping and Reporting

1. Waste received from off-site complies with manifest requirements.

Yes ___ No ___

2. Owner/operator maintains an adequate written operating record(s) at the facility.

Yes ___ No ___

3. Owner/operator maintains an adequate closure plan for all facilities.

Yes ___ No ___

4. Owner/operator maintains an adequate post closure plan for disposal facilities.

Yes ___ No ___

Section M - Financial Assurance

1. Owner/operator had financial assurance for the most recent closure and post closure cost estimates for all facilities by July 6, 1982.

Yes ___ No ___ N/A ___

2. Owner/operator has liability coverage or preparations made for coverage of sudden accidental releases by July 15, 1982.

Yes ___ No ___ N/A ___

3. Owner/operator has non-sudden accidental occurrence for certain storage, treatment and disposal facilities due by Jan. 16,

Yes ___ No ___ N/A ___

83, 84, 85

Checklist GFC
(attach to correct checklist)

Date 5-25-83

Reg./~~Permit~~ No. 30445

INDUSTRIAL SOLID WASTE

Compliance Monitoring Inspection Report

COMMENTS SHEET

SECTION: F Paragraph: 1

No personnel training records are maintained.
This was noted during the ^{previous} inspection (dated 12-7-1981).

SECTION: H Paragraph: 2

Contingency plan was being revised. A copy will be
requested when revisions are completed.

SECTION: _____ Paragraph: _____

INDUSTRIAL SOLID WASTE

Compliance Monitoring Inspection Report Surface Impoundments Checklist (TAC 335.281-.288)

Class of Waste (H) ^(inactive)

1. Are surface impoundments presently used to treat or store waste? Yes ___ No ☒
- a. If yes, inspect the impoundments.
- **2. Does the impoundment appear to maintain at least 2 feet (60 cm) of freeboard? Yes ___ No ☒
- **3. Check for evidence of overtopping of the dike. Is the facility compliant? Yes ___ No ☒ See comments
- **4. Check for evidence of seepage. Is the facility compliant? Yes ___ No ☒ see comments
5. Containment system for dyked or dammed impoundments (335.283)
 - **a. Does the earthen dike have a protective cover (e.g. grass, shale, rock) to minimize wind and water erosion? Yes ☒ No ___
6. What wastes are treated or stored in the impoundment? inactive

7. Are waste analyses and trial tests conducted on these wastes (chemical processing of a different hazardous waste or method only)? N/A ☒ Yes ___ No ___
 - a. If not, does the owner/operator have written documented information on similar treatment of similar wastes? Yes ___ No ___
8. Is this information retained in the operating record? N/A ☒ Yes ___ No ___
9. Is the impoundment inspected daily to check freeboard level? Yes ☒ No ___
10. Is the impoundment, dikes and vegetation surrounding the dike inspected weekly to detect leaks, deterioration or failures? Yes ☒ No ___

TDWR-

Page 3 of 27 of Group II

*(Changed 9/10/82, response format realigned, other minor changes)

**See Note on Page 1

***This response column indicates noncompliance.

11. Does the impoundment have a liner?

Yes ☒ No ☐

a. If Yes, what type? Clay lined

b. If Yes, does it have a leachate collection and removal system?

Yes ☐ No ☒

**12. Is there evidence of ignitable or reactive wastes placed in the impoundment?

Yes ☐ No ☒

a. If Yes, explain in comments sheet [review 335.118(a)];

or
b. If Yes, is the impoundment used solely for emergencies?

Yes ☐ No ☐

**13. Is there evidence of incompatible wastes placed in the impoundment [if yes, review 335.118(b)]?

Yes ☐ No ☒

14. Are monitor wells required for this site? (Refer to Rule 335.191-.195 - Ground Water Monitoring)

Yes ☐ No ☒

a. Has owner/operator installed, operated and maintained a ground water monitoring system (unless waived) prior to 11/19/81?

Yes ☐ No ☐

NOTE 1: Attach Ground Water Monitoring Report if answer to question 14 is yes.

15. Describe impoundment(s) site and indicate plat map, location(s) and designation(s). Also describe each impoundment's dimensions and capacity (acre-feet):

See Attachment B

100' x 150' x 5' (.36 acre)

NOTE 2: If the answer is No for Nos. 5a, 7a, 8, 9, 10 and No. 14 after 11/19/81, explain in comments sheet.

TDWR-

Page 4 of 27 of Group 11

*(Changed 9/10/82, response format realigned)

**See Note on Page 1

***See Note Page 3

Date 5-25-83

Reg./~~Permit~~ No. 30446

INDUSTRIAL SOLID WASTE

Compliance Monitoring Inspection Report

COMMENTS SHEET

SECTION: 2, 3, 4 Paragraph: _____

The surface impoundment did not have 2 ft of freeboard at the time of the inspection. The dike in ~~the~~ southwest corner appeared to have been overtopped. ~~and~~ The area between the fence and impoundment had no vegetation growing, possible seepage.

SECTION: _____ Paragraph: _____

This impoundment will be closed in accordance with an Agreed-Final Judgement dated Dec. 13, 1982, District Court of Jefferson County.

SECTION: _____ Paragraph: _____

06-22-7

DWD550

TEXAS DEPARTMENT OF WATER RESOURCES
NOTICE OF REGISTRATION
INDUSTRIAL SOLID WASTE GENERATION/DISPOSAL

THIS IS NOT A PERMIT AND DOES NOT CONSTITUTE AUTHORIZATION OF ANY WASTE MANAGEMENT ACTIVITIES OR FACILITIES LISTED BELOW. REQUIREMENTS FOR SOLID WASTE MANAGEMENT ARE PROVIDED BY TEXAS ADMINISTRATIVE CODE SECTION 335 OF THE RULES OF THE TEXAS DEPARTMENT OF WATER RESOURCES (TDWR). CHANGES OR ADDITIONS TO WASTE MANAGEMENT METHODS REFERRED TO IN THIS NOTICE REQUIRE WRITTEN NOTIFICATION TO THE TDWR.

DATE OF NOTICE: 05-27-83

REGISTRATION NUMBER: 30446

EPA I.D. NUMBER: NOT APPLICABLE

THE REGISTRATION NUMBER PROVIDES ACCESS TO STORED INFORMATION PERTAINING TO YOUR OPERATION. PLEASE REFER TO THAT NUMBER IN ANY CORRESPONDENCE.

COMPANY NAME: CHEMALL, INC
MAILING ADDRESS: P. O. BOX 309
GROVES, TEXAS

77619

GENERATING SITE LOCATION:

5500 ST HWY 366 & HOGABOOM RD, PORT NECHES, TX

CONTACT PERSON: B. L. OWEN

PHONE: (713) 727-1471

NUMBER OF EMPLOYEES: 8 - 24

TDWR DISTRICT: 06

REGISTRATION STATUS: ACTIVE

RECEIVED

JUN 30 1983

DEPT. OF
WATER RESOURCES
DISTRICT 6

I. WASTE GENERATED:

WASTE NUMBER	DESCRIPTION	CLASS	CODE	DISPOSITION
001	PLANT REFUSE, GENERAL MISC.	II	279760	OFF-SITE
002	WAX (No longer generated)	INH	180610	OFF-SITE
003	DIRT, TOXAPHENE CONTAMINATED	IH	979180	OFF-SITE
EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS): D015				
004	DIRT, PETROLEUM CONTAMINATED	INH	179840	OFF-SITE
005	OILS, WASTE	JNH	110450	OFF-SITE
006	ACID, HYDROCHLORIC (DILUTE) (No longer generated)	INH	101010	OFF-SITE

NOTICE OF REGISTRATION (CONTINUED)
REGISTRATION NUMBER: 50446
COMPANY NAME: CHEMALL, INC

PAGE

2042
2

007 FILTERS FROM LUBE OIL POLISHIN INH 178450 OFF-SITE *No longer generated*
G
008 ALUMINUM CHLORIDE *only is spilled* ~~INH~~ 174250 OFF-SITE *H₂ reactive*
009 COPPER OXIDE *Sold for recycling* INH 174260 OFF-SITE
010 OILY SLUDGES, HEAVY *Sold for recovery* INH 150430 OFF-SITE
011 COPPER CHLORIDE *only is spilled* INH 102970 OFF-SITE

II. SHIPPING/REPORTING: PURSUANT TO TEXAS ADMINISTRATIVE CODE SECTION 335 OF THE RULES OF THE TDWR PERTAINING TO INDUSTRIAL SOLID WASTE MANAGEMENT, ISSUANCE OF SHIPPING-CONTROL TICKETS AND MONTHLY REPORTING ARE REQUIRED FOR OFF-SITE STORAGE/PROCESSING/DISPOSAL OF THE FOLLOWING CLASS I WASTES LISTED IN PART I. A SHIPMENT SUMMARY REPORT SHOULD BE SUBMITTED FOR EACH MONTH NOT LATER THAN THE 25TH OF THE FOLLOWING MONTH.

002 180610 WAX
003 979180 DIRT, TOXAPHENE CONTAMINATED
004 179840 DIRT, PETROLEUM CONTAMINATED
005 110450 OILS, WASTE
006 101010 ACID, HYDROCHLORIC (DILUTE)
007 178450 FILTERS FROM LUBE OIL POLISHIN
G
008 174250 ALUMINUM CHLORIDE
009 174260 COPPER OXIDE
010 150430 OILY SLUDGES, HEAVY
011 102970 COPPER CHLORIDE

III. ON-SITE WASTE MANAGEMENT FACILITIES:

NONE IDENTIFIED

IV. RECORDS: NOT APPLICABLE

HOGABOOM ROAD

002
Waste
Stormwater
Outfall

Drum
Storage Area
(Enclosed)
(Active)
4500 sq. ft.
1 acre

Well, Industrial

BOILER
FEED-
WATER
STORAGE
POND

Well, Industrial

United Parcel Service

FM ROAD 366

001 North Stormwater Outfall

EVAPORATION
POND

← Clay-lined
Waste Pond
(Inactive) 100' x 150' x 5'
.36 acre

001 South Stormwater Outfall

004 East Stormwater
Outfall

APR 28 '83

PILKO & ASSOCIATES, INC.

Consultants to the Chemical/Energy Industries

April 26, 1983

Mr. Tommy Mason
Texas Department of Water Resources
P.O. Box 13087
Capitol Station
Austin, TX 78711

Enclosed is the closure plan for the existing wastewater treatment pond at Chemall, Inc. We wrote the closure plan to meet specific requirements in Chemall's permit for the new wastewater treatment facilities.

Chemall requests that the Texas Department of Water Resources allow the pond to be closed out according to the new schedule which is part of the closure plan. The original schedule submitted in May of 1982 assumed the project would be completed during the summer months of 1982. Since final permit action was not taken until the end of November 1982, the original project schedule fell into the worst weather months. The closure plan shows how the existing spray evaporation system will allow us to remove most of the wastewater now present in the pond very economically. Operating the evaporative system during the months of May, June, July and August, will maximize efficiency. The alternative, deepwell injection of this wastewater, will be extremely costly and has no ecological advantage over evaporation.

We have also sampled and analyzed untreated water in the pond to evaluate the impact of direct discharge of the water to the Jefferson Canal. Activated carbon adsorption was tested to determine the effects of additional treatment prior to discharge. As can be seen in our wastewater characterization, the only parameter that exceeds current limitations of the Department of Water Resources is a copper. pH adjustment and filtration will reduce the concentration to less than the acceptable 2 milligrams per liter. Total dissolved solids and chlorides should not be a problem because the receiving stream is a brackish estuary and the total quality of water is very small.

We believe that the enclosed plan meets the requirements and specifications of the Department of Water Resources. If additional data or copies of this report are required, please contact me directly. We look forward to an

861 1417

opportunity to discuss the compliance schedule and all the requirements that might be imposed for direct discharge of the wastewater.

For PILKO & ASSOCIATES, INC.

Richard F. Smullen, Jr.

Richard F. Smullen, Jr.
Principal

RFS:sr

Attachment

cc: Mr. Michael Dick, TDWR
Mr. Michael Moore, TDWR-Orange
Mr. Ben Owen, Chemall
Mr. Spencer Savoie, Chemall
Mr. Paul Gosselink, Booth, Lloyd & Simmons


CLOSURE PLAN FOR EXISTING ABANDONED WASTEWATER

TREATMENT POND AT CHEMALL, INC.

→ BACKHOL
→ DOZER
→ KILN DUST
→ VISQUEEN - 12-15-83
→ CHEM + HERE

I. POND DESCRIPTION

The existing out-of-service wastewater treatment pond is located in the northwest corner of the plant. A copy of Drawing P-102 from the plans and specifications for wastewater treatment is included to show the location and a cross-section of this pond. At the crown of the dike the pond width is 82 feet and length is 176 feet. Side slopes on the inside of the pond are approximately 2 horizontal to 1 vertical. This pond was constructed to be partially above and partially below existing grade. Soil excavated from the center of the pond was used to construct dikes around the perimeter. The pond depth varies due to the presence of water sludges and a slightly sloped bottom. The average depth of the pond from the top of the levee is 8 feet with a maximum depth estimated to be approximately 10 feet. During the wet winter of 1982 and 1983, water elevation in the pond approached the top of the dike. The spray evaporation system was activated to reduce the volume of water in the pond. The volume of the pond at different depths is presented below.



<u>Depth</u>	<u>POND VOLUME</u>
8 feet	616,000 gallons
6 feet	509,000 gallons
2 feet	200,000 gallons
1 foot	104,000 gallons

77,000
8/233
100 M
104 M/ft

The contents of the pond is split as follows:

Total Pond Volume	-	616,000 gallons
Volume of Water	-	512,000 gallons
Volume of Sludge	-	104,000 gallons

II. WATER CHARACTERISTICS

Water samples were taken at various locations and composited to form a single sample characteristic of all the water in the pond. This sample was then analyzed for the parameters specified in the Chemall Wastewater Discharge Permit and for additional parameters to investigate direct discharge of the water. The analyses are as follows:

Total Dissolved Solids - 18,000 milligrams/liter
Chlorides - 8,800 milligrams/liter
Sulfates - 30 milligrams/liter
COD - 290 milligrams/liter
Toxaphene -.024 milligrams/liter

Arsenic - .03 milligrams/liter
Barium - less than .2 milligrams/liter
Cadmium - less than .005 milligrams/liter
— Chromium - 2.8 milligrams/liter
— Copper - 8.6 milligrams/liter
Lead - less than .05 milligrams/liter
Manganese - .03 milligrams/liter
Mercury - less than .0002 milligrams/liter
Nickel - .23 milligrams/liter
Selenium - less than .01 milligrams/liter
Silver - less than .02 milligrams/liter
Zinc - .02 milligrams/liter
Total Organic Halogens - 1.5 milligrams/liter
pH - 9.2

III. WATER TREATMENT

The total volume of wastewater is estimated to be 512,000 gallons. The only parameter exceeding known discharge limits is copper which was measured at 8.6 milligrams per liter. The concentration of toxaphene is less than the .04 milligrams per liter in the discharge permit. Dissolved solids and chlorides, which are both high, should not cause a problem in the brackish final receiving stream.

Chemall, Inc. proposes to use an existing spray evaporation system to remove the bulk of the water from the pond. The evaporation system has several advantages. Evaporation will make use of existing equipment and does not require additional capital expenditure. During the approaching summer months, evaporation will be at its maximum and we will be able to reduce the water to very low levels. The evaporative system can remove between 327,000 and 412,000 gallons of water. Using a 5 hp motor continuously over the next four months, the total cost for evaporation will be approximately \$1,200. Use of the evaporative system will not result in any significant adverse impact to the local environment.

Maximum use of the evaporative system could still leave between 100,000-185,000 gallons of water in the pond. We investigated three alternative methods for disposal of this residual water. Since the only parameter exceeding probable discharge limits is copper, our initial proposal is to adjust the pH to precipitate copper. Then, following filtration, discharge the water to outfall 001. Copper concentration would be less than 2 milligrams per liter. This discharge should have no adverse impact on the receiving stream.

One alternative disposal method would be to use activated carbon adsorption to reduce the concentration of organic materials in the water. This method is being investigated for its effect on the receiving stream.

organic halogens. The concentration of toxaphene is already below the levels acceptable for discharge and effect of carbon on this parameter was not measured. The cost of activated carbon is based upon using a pre-packaged treatment system sold by Toxisorb Corporation. Using their C-20 Cansorb unit, we estimate the total cost of activated carbon adsorption to be between \$2,000-\$3,000.

The other alternative disposal method is that proposed in the wastewater discharge permit, deepwell injection. Current estimates for deepwell injection in the Port Arthur area range from \$.39-.40 per gallon, plus transportation. With an average cost of \$.35 per gallon, disposal of the residual wastewater will cost between \$35,000-\$65,000. Considering the lack of adverse impacts for the proposed alternatives, the excessive cost of deepwell injection is not warranted.

IV. SLUDGE CHARACTERISTICS

The volume of sludge in the pond is about 104,000 gallons. As specified in the wastewater discharge permit, the sludge was sampled and characterized as follows:

- Toxaphene
- Cadmium
- Chromium
- Copper
- Lead
- Selenium
- Silver

V. SLUDGE SOLIDIFICATION

Residual sludges will be solidified in-place using kiln dust. Current cost of kiln dust in the Port Arthur/Groves area is about \$7.00 per yard. The partially dried sludge will require approximately 1 yard of kiln dust per yard of wet sludge. We estimate the cost of solidification, including materials and handling to be \$20.00 per yard. The total cost of insitu solidification, therefore, will be approximately \$10,000.

VI. BACKFILL AND CAPPING

Drawing P-102 from the plans and specifications for the wastewater treatment system is included as a part of this closure plan to show the construction and placement of the cap and the location of the pond. Materials used to construct the levees for the existing pond will be used to backfill the pond to a depth 2 feet below the existing ground surface. Solidified sludge and fill material will be compacted to 90 percent procter density. A final cap will be placed over the existing solidified sludge material using stratum 2 material excavated during the construction of the new stormwater treatment facility.

The stratum 2 material is described in detail in the plans and specifications already submitted to the Department of Water Resources. Stratum 2 material meets the characteristics specified by the Department of Water Resources.

- o Permeability less than or equal to 1×10^{-7} centimeters per second
- o Percent passing number 200 sieve greater than or equal to 30
- o Liquid limit greater than or equal to 30
- o Plasticity index greater than or equal to 15

The contract for construction of the wastewater treatment facility requires the contractor set aside sufficient stratum 2 material to construct the cap for the existing wastewater pond.

Including below grade material, the cap will have a minimum depth of 3 feet at the perimeter of the pond. With a 2 percent slope from the perimeter to the center of the pond, (a distance of 41 feet), the maximum thickness of the cap will be 3.85 feet at its center line. From the edge of the perimeter to grade level the cap will be sloped at 5 percent for an approximate distance of 20 feet to ensure runoff away from the pond and control erosion.

All stratum 2 material used to construct the cap will be recompact to 95 percent proctor density.

The total cap material required for closure is estimated to be 1,603 cubic yards of stratum 2 clays. Estimated cost for the cap is \$4,800.00.

VII. VEGETATIVE COVERS

Specifications for construction of the new stormwater treatment facility require that organic rich soils located at the surface be stockpiled separate from all other soils. This stratum 1 material contains the root mat and organic (humus) material that is ideal for vegetation growth. Approximately 3 inches of this material will be placed over the final cap. It will be seeded with a mixture of rye and bermuda grasses and the seeds held in place by a sprayed emulsion of tar and straw following final construction. The vegetative cover will be watered as required until it is of sufficient maturity to sustain growth.

VIII. METES AND BOUNDS

Following closure, the boundaries of the existing pond will be marked with stakes and the metes and bounds of the facility will be recorded at the Jefferson County Courthouse. The total cost of the final survey is estimated to be approximately \$500.

IX. SCHEDULE

The proposed project schedule for closure of the existing wastewater pond is shown in Figure 1.

Evaporation of the existing water in the pond is the most cost-effective way to reduce volume. Chemall proposes to use the existing spray evaporation system during the months of May, June, July and August.

During the month of August, Chemall will measure the concentration of copper and other key parameters in residual water. Chemall will request permission from the Department of Water Resources to then discharge the residual water provided it meets the requirements of the Department.

Activated carbon does effect some treatment of the water to reduce the concentration of TOC and copper. TOC at present levels, however, will not adversely effect the receiving stream. Copper can be removed by pH adjustment and filtration. We propose, therefore, that treatment be limited to a pH adjustment and filtration.

During September, residual solids will be mixed with kiln dust and solidified. Following solidification, which should be completed in less than one week, a final cap will be installed as per our specifications and drawings.

Final closure of the facility will be completed by September 30, 1983. Following closure, the metes and bounds of the pit will be recorded in the Jefferson County Courthouse.

CHEMALL EXISTING WASTEWATER POND
CLOSURE SCHEDULE



EXCAVATE AND STOCKPILE STRATUM 1 SOILS



EXCAVATE AND STOCKPILE STRATUM 2 SOILS



EVAPORATE EXISTING POND WATER



ANALYZE RESIDUAL POND WATER



DISPOSE RESIDUAL POND WATER



SOLIDIFY RESIDUAL POND SLUDGES



BACKFILL POND



PLACE FINAL CAP, COVER, AND SEED



APRIL

MAY

JUNE

JULY

AUGUST

SEPTEMBER



CHEMALL, INC.

5500 STATE HIGHWAY 366 AT HOGABOOM ROAD • PORT NECHES, TEXAS

P.O. BOX 309, GROVES, TEXAS 77619 • 713-727-1471

March 25, 1982

Mr. Dick Martin
TDWR
Solid Waste Section
1700 N. Congress Ave.
Austin, TX

RE: Request for Additional Solid Waste Determinations, JUN 14 1982
Chemall, Inc., Registration No. 30446

Dear Mr. Martin:

During a solid waste compliance monitoring inspection at our plant, several questions were raised concerning materials used at this facility. Following is a list of these materials and laboratory data requested by the TDWS field representative.

- 0th 178450 1. Spent Filter Media - These filter cartridges and bags are used as polishing filters for our lube oil product. Composite samples from several filters were submitted to Kemron Environmental Services for an EP extraction test. Results of this test are attached.
- 11 274250 2. Aluminum Chloride - This chemical is a raw material for Cosorb solvent manufactured here at Port Neches. Our supplier, Witco Chemical Corporation, has offered to reprocess any of this material which becomes contaminated. A copy of Witco's offer of services is attached.
- 19 274260 3. Spent Copper Chloride (Copper Oxide) - Copper chloride is generated during the manufacturing process of Cosorb solvent. The copper chloride is converted in the process to copper oxide. We plan to sell this copper oxide for its copper value.
- 10 250430 4. Oily Sludges (Tank Bottoms) - Periodically, on a 24-month schedule, our lube oil tanks are cleaned. The oil, grease and sludge resulting from these cleanings have, in the past, been sold for their fuel value to various fuel-compounding firms.

Could you please advise us if these materials fall under the requirements of hazardous wastes and if so, please add them to our registration.

If you have any questions, please call me at 713-727-1471.

Sincerely,

CHEMALL, INCORPORATED

B. L. Owen
Executive Vice President

BLO:bh
Attachments

SJK

MAR 11 '82



Kemron Environmental Services

Sample Source See Below
 Collected by Chemall, Inc.
 For Chemall, Inc.
P.O. Box 309
Groves, Texas 77619
Attn: Ben Owen

Report Date 03/03/82
 Date Collected N/A
 Date Received 12/09/81
 Date(s) Analyzed See Below
 Data Number 120981-5F
 Purchase Order Number _____

Results of Analysis

Filter - EP ExtractionParameterDate / Time / Analyst

Arsenic, mg/l As	0.028	02/03/82 / 1630 / RK
Barium, mg/l Ba	151	02/26/82 / 1605 / RK
Cadmium, mg/l Cd	0.010	02/22/82 / 2100 / RK
Chromium, mg/l Cr	0.030	02/17/82 / 1535 / RK
Lead, mg/l Pb	0.52	02/28/82 / 1000 / DB
Silver, mg/l Ag	<0.01	03/01/82 / 1910 / RK
Mercury, mg/l Hg	0.010	02/12/82 / 1200 / RK
Selenium, mg/l Se	<0.002	02/05/82 / 1100 / RK

DRB:kw

Analysis Number 82-20109-010

D.R. Budd
Regional Manager

Official Methods Used In This Analysis

Borg Warner Corporation

Administrative Office: Marietta, Ohio 235 Second Street (614) 374-2222 Zip 45750

Laboratory Locations:

☐ BATON ROUGE, LOUISIANA
 16550 Highland Road
 (504) 293-8650 Zip 70808

☐ CHICAGO, ILLINOIS
 3570 North Avondale Avenue
 (312) 588-8500 Zip 60618

☐ FARMINGTON HILLS, MICHIGAN
 32740 Northwestern Highway
 (313) 626-2426 Zip 48018

☐ MARIETTA, OHIO
 235 Second Street
 (614) 374-2222 Zip 45750

☐ PORT NECHES, TEXAS
 1216 Port Neches Avenue
 (713) 727-1661 Zip 77651

Attach 3-25-82

Witco

MAR 11 '82

Pearsall Chemical Division

Witco Chemical Corporation, P.O. Box 437, Houston, Texas 77001 Telephone (713) 682-6331

March 8, 1982

Mr. Ben Owen
c/o Chemall Inc.
Calabrian Chemical Corporation
Highway 366 @ Hogaburn Rd.
Pt. Neches, TX 77651

Dear Mr. Owen:

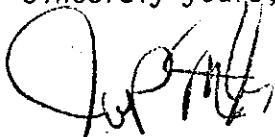
I would like to offer our services to pick up contaminated aluminum chloride and reprocess this material at our plant. There will not be a credit issued or freight charged.

The contaminated material must be packaged in 55 gallon, 17 C, open head drums. The lid and outer ring should be tightly sealed.

Since we deliver in the area of your plant frequently, we can pick up this material on short notice.

If there are any questions, feel free to contact me.

Sincerely yours,



John P. Meglic
Traffic Manager

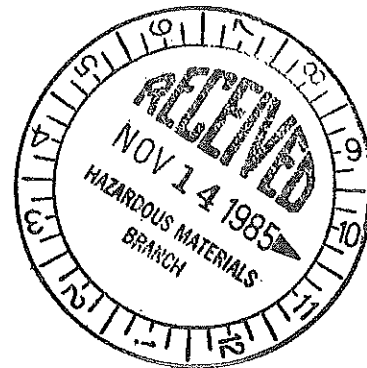
JPM:jeb

*Attach
3-25-82*



CHEMALL, INC.

5500 STATE HIGHWAY 366 AT HOGABOOM ROAD • PORT NECHES, TEXAS
P.O. BOX 309, GROVES, TEXAS 77619 • 409-727-1471



TXD089792543

November 5, 1985

United States Environmental Protection Agency
Region VI
1201 Elm Street
Dallas, Tx 75270

Dear Sirs:

We have one facility which was a pond which was closed and filled under court direction and administered by TDWR in 1981. At this time the plant manufactures Sodium Thiosulfate, Copper chlorides and Copper iodide. No hazardous waste is received, stored, created or treated. We have asked to rescind the hazardous waste permit, which had been applied for by accident.

In answer to your request for information please find:
(Question 1 and 2)

- a) A copy of the legal statement to the county clerk with respect to the closure of the pond.
- b) A plot plan showing the above.
- c) An affidavit to say that we are no longer storing, processing, disposing of hazardous waste.

(Question 3)

- a) With regard to the plan for closure this was negotiated in court and the compliance was monitored by TDWR.

(Question 4)

- a) No land disposal facility existed.
- b) No liquid or solid per month was disposed of. The pond had not received hazardous waste since 1980.

RECEIVED 6AW-HE

NOV 1 1985

Sincerely,


Brian Davis

BD/blc



File II A.6.

TXD 089792543

OCT 31 1985

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Chemall Inc.
P. O. Box 307
Groves, Texas 77619

RE: Request for Information Pursuant to §3007 of the Resource
Conservation and Recovery Act, 42 U.S.C. §6927

Dear Owner/Operator:

The Environmental Protection Agency (EPA) is hereby advising you that the Resource Conservation and Recovery Act of 1976 (RCRA) has been amended by the Hazardous and Solid Waste Amendments of 1984 (the Amendments), and in particular, is informing you of a new provision known as the loss of interim status provision. The purpose of this letter is to provide additional guidance relative to the loss of interim status provision and to request information regarding your operations before and after November 8, 1985.

The loss of interim status provision states:

(2) In the case of each land disposal facility which has been granted interim status under this subsection before the date of enactment of the Hazardous and Solid Waste Amendments of 1984, interim status shall terminate on the date [November 8, 1985] twelve months after the date of the enactment [November 8, 1984] of such Amendments unless the owner or operator of such facility-

(A) applies for a final determination regarding the issuance of a permit under subsection (c) for such facility before the date twelve months after the date of the enactment of such Amendments; and

(B) certifies that such facility is in compliance with all applicable groundwater monitoring and financial responsibility requirements.

The EPA's interpretation of the requirement under this provision is published at 50 Federal Register 38946 (September 25, 1985), a copy of which is enclosed. Please read and follow this closely. In order for

6H-HO:PSADOWSKI:bvx9885

Control Disc #4

you to continue to place wastes in any land disposal unit at your facility on and after November 8, 1985, you must submit: (1) A Part B operating permit application, and (2) a certification of compliance with all applicable groundwater monitoring and financial responsibility requirements prior to November 8, 1985. Certification is allowed on a unit-by-unit basis. The Part B application should be mailed or delivered by November 8, 1985, to:

Mr. Minor Hibbs, Chief
Hazardous and Solid Wastes
Permits Section
Texas Water Commission
1700 N. Congress Ave.
Austin, Texas 78701

The certification should be mailed by November 8, 1985, to:

U.S. Environmental Protection Agency and
Hazardous Waste Management Division
Interfirst II Building - 28th Floor
1201 Elm Street
Dallas, Texas 75270
Attn: Mr. William Rhea (6H-HO)

Mr. Minor Hibbs, Chief
Hazardous and Solid Wastes
Permits Section
Texas Water Commission
1700 N. Congress Ave.
Austin, Texas 78701

The owner/operator of a facility may certify compliance only if the facility or units for which interim status is retained is in physical compliance. Because this is a Federal statutory provision, an outstanding order issued by any agency with a compliance date on or beyond November 8, 1985, does not relieve the owner/operator of the obligation to be in physical compliance by the date the certification is due. You may not interpret or rely on any order or compliance schedule therein as an extension of the November 8, 1985, deadline. Moreover, difficulties in achieving compliance, such as obtaining insurance, will not be considered as an excuse or exemption from the requirement of physical compliance.

If you do not certify compliance with groundwater monitoring and financial responsibility requirements, and you do not submit a Part B permit application by November 8, 1985, you must cease to place wastes into the land disposal units in question by that date and submit a closure plan for these units to the above addresses by November 23, 1985. This follows by operation of law and does not require notice from EPA.

You are hereby required, pursuant to the authority of §3007 of RCRA, 42 U.S.C. §6927, to report to EPA the following additional information regarding hazardous waste land disposal units that had interim status on or before November 8, 1985, and/or received hazardous waste after November 19, 1980. In particular, you are to submit the information requested in Enclosure 2 according to the schedule specified in

Enclosure 2. Each submission must identify the facility by name, mailing address, facility location, and EPA RCRA I.D. number. Identify the information request number or repeat the request, include a self-explanatory and complete response, and date and sign each response.

You may, if you desire, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 CFR §2.203(b). You should read the above-cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim. Information covered by such a claim will be disclosed by EPA only to the extent, and by the means of the procedures, set forth by 40 CFR Part 2, Subpart B. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you.

Please forward the additional information requested to:

U.S. Environmental Protection Agency
Hazardous Waste Management Division
InterFirst II Building - 28th Floor
1201 Elm Street
Dallas, Texas 75270
Attn: Mr. William Rhea (6H-HO)

Failure to comply with the above request within the time frame specified may result in an enforcement action by EPA under the authority of §3008 of RCRA, including the assessment of penalties. You should also be aware that knowingly falsifying any information provided pursuant to this request is a criminal violation under §3008(d)(3) of RCRA, and other provisions and may result in fines and imprisonment.

If you have any questions with regard to the above, or should you need further clarification regarding your response to this letter, please contact Mr. William Rhea of my staff at (214) 767-9731.

Sincerely,

Allyn M. Davis
Director
Hazardous Waste Management Division

Enclosures

cc: Minor Hibbs
Texas Water Commission

AFFIDAVIT OF EXCLUSION FROM HAZARDOUS WASTE PERMITTING REQUIREMENT

Registration No. 30446
Application No. _____
(Dept. Use Only)
Facility Name Chemall, Inc.
County of Jefferson

JUN 27 1985

Brian Davis

being duly sworn, deposes and says:

I am Plant Manager of Chemall, Inc.
Title (Owner or Principal Officer) Facility Owner
5500 Hwy 366, Port Neches, Texas
and Address

This affidavit is being executed for the purpose of notifying the Executive Director of the Texas Department of Water Resources that the named facility does not require a hazardous waste permit because:

Check appropriate box(es):

- ☒ No hazardous waste is stored, processed or disposed on-site
- ☐ The facility qualifies for the "Accumulation Time" storage exclusion of Texas Administrative Code, Section 335.69
- ☐ The facility qualifies for the "Small Quantity Generator" exclusion of Texas Administrative Code, Section 335.2(e)
- ☐ The facility qualifies for the "Elementary Neutralization Unit" exclusion of Texas Administrative Code, Section 335.2(f)
- ☐ The facility qualifies for the "Wastewater Treatment Unit" exclusion of Texas Administrative Code, Section 335.2(f)
- ☐ Other (Explain with an attachment and reference TDWR rule)

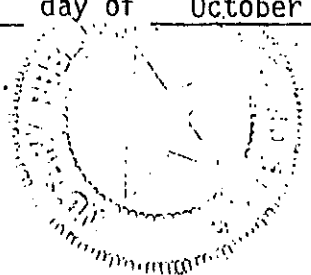
[Signature]
Signature

Sworn to before me this
17th day of October, 1985.

Becky A. Hanna
Notary Public in and for

Jefferson County, Texas

My commission expires 06/04/89



TEXAS DEPARTMENT OF WATER RESOURCES

1700 N. Congress Avenue
Austin, Texas

TEXAS WATER DEVELOPMENT BOARD

Louis A. Beecherl, Jr., Chairman
George W. McCleskey, Vice Chairman
Glen E. Roney
Lonnie A. "Bo" Pilgrim
Louie Welch
Stuart S. Coleman



Charles E. Nemir
Executive Director
June 6, 1985

TEXAS WATER COMMISSION

Paul Hopkins, Chairman
Lee B. M. Biggart
Ralph Roming

Mr. B. L. Owen
Chemall, Inc.
P. O. Box 309
Groves, Texas 77619

CERTIFIED MAIL

Dear Mr. Owen:

Re: Industrial Solid Waste Registration No. 30446

The Texas Department of Water Resources (TDWR) is implementing the hazardous waste permitting program for industrial solid waste facilities in Texas. Our records indicate that you filed a state and/or federal Part A hazardous waste permit application for an operational hazardous waste storage, processing, and/or disposal facility as referenced above. In accordance with Title 31 Texas Administrative Code (TAC) Section 341.180, we hereby request submittal of Part B of your hazardous waste permit application, as well as any necessary modifications or additions to the Part A application already on file.

Pursuant to the Hazardous and Solid Waste Amendments of 1984 (HSWA), amending the Resource Conservation and Recovery Act (RCRA), the Part B application and Part A modifications for any company operating disposal units should be submitted by November 8, 1985. By law, authorization to continue hazardous waste land disposal at your facility will terminate on this date if the complete application is not submitted. Therefore, your complete application is due November 8, 1985. If your facility does not include any disposal units subject to permitting, please contact the Solid Waste Section upon receipt of this letter.

The HSWA established new requirements for which the State has not yet received authorization. As a result, permits issued by the TDWR cannot completely satisfy the federal permit requirements, and a separate permit issued by EPA is necessary. To minimize duplication of effort, the State and EPA have executed a joint permitting agreement. Pursuant to this arrangement, the TDWR will take the lead in processing permit applications, thus serving as the primary contact for applicants. The TDWR will also develop permits under State authorities which can be issued by both agencies. Since we will transmit one copy to EPA Region VI and coordinate all subsequent permit processing steps with their office, all copies of your permit application should be submitted to the TDWR.

Please find enclosed for your use a blank Part A application form and a current copy of your TDWR Notice of Registration (NOR). If the Part A application currently on file with TDWR does not accurately reflect hazardous waste management activities at the facility, then the Part A should be revised accordingly



and submitted with the Part B application. If wastes currently listed on the Part A are no longer considered to be hazardous, you must submit appropriate documentation accompanying the revision to support the deletion. Likewise, if a unit is identified on the Part A which is not now considered to be a hazardous waste management unit, you must support the deletion by:

- 1) demonstrating that the unit has been or will be closed pursuant to a closure plan approved by the Executive Director;
- 2) demonstrating that the unit has not been used for hazardous waste management since November 19, 1980; or
- 3) demonstrating that the unit qualifies for an exclusion from permitting as prescribed in 31 TAC 335.2 and/or 335.69.

If you intend to delete hazardous waste or hazardous waste management units from the facility's Part A, you should upon receipt of this letter contact the Solid Waste Section and initiate the necessary actions. When you submit the facility's Part B permit application, it must fully address each hazardous waste and hazardous waste management unit which is identified on the Part A.

In revising your Part A application, please ensure that each waste and facility unit is identified by the appropriate waste classification code number and facility sequence number as noted in the NOR. If the NOR does not accurately reflect current waste management activities at the facility, please make the necessary corrections and submit a revised copy to the Solid Waste Section within 60 days of receipt of this letter. Each waste and facility unit identified in your Part A application should have the same waste code number and facility sequence number that are listed in your NOR.

Please also find enclosed for your use a copy of the industrial hazardous waste Part B permit application form and instructions. The instructions cover the technical requirements of the application in detail and are not to be submitted with the application. In order for you to meet the required submittal date, certain types of demonstrations, as applicable, must be initiated shortly after receiving this letter. As a result, you should upon receipt of this letter contact the Solid Waste Section and initiate necessary action if:

- 1) Your company intends to pursue any type of waiver or exemption;
- 2) Your company is required to do synthetic membrane liner compatibility testing (i.e., a 120-day test using EPA Test Method 9090) for new waste management units or lateral expansion of existing units; or
- 3) Your company is required to conduct field tests or laboratory analyses in conjunction with the treatment demonstration required for land treatment units.

Your company must also determine for each waste management area whether a detection ground-water monitoring program, a compliance monitoring program, or a corrective action program is required. If the presence of hazardous constituents has not been detected in the ground water at the time of the permit application, your company must submit sufficient information to establish a detection monitoring program. If a detection monitoring program is required, your company must prepare a ground water monitoring report in response to Section V of the Part B permit application which meets the informational requirements of 40 CFR 270.14(1), (2), (3), (5), and (6). If the presence of hazardous constituents has been detected in ground water at the point of compliance at the time of permit application, your company must submit sufficient information to establish a compliance monitoring program. If a compliance monitoring program is required, your company must prepare a compliance plan report in response to the Ground Water Compliance Plan Application which meets the informational requirements of 40 CFR 270.14(1), (2), (3), (4), (5), and (7). The conditions which would require your company to submit sufficient information to establish a corrective action program are described in 40 CFR 270.14(c)(8). You will find enclosed a copy of the Ground Water Compliance Plan Application which is for your use if either a compliance monitoring or corrective action program is required. In this event, the original and three copies of the Ground Water Compliance Plan Application must be submitted with the Part B.

In addition to the information specified in the Part B application form, HSWA and TDWR rules require the following:

1. An exposure assessment must be submitted. This assessment must address: (a) potential hazardous waste releases from transportation to or from the waste management unit(s), normal operations at the unit(s), and accidents; (b) potential pathways of human exposure from such releases; and (c) potential magnitude and nature of human exposure from such releases.
2. The location and areal extent of all non-hazardous waste disposal units (past and present) on the plant site which are not identified in the Part B application should be indicated on the plan-view drawing required in III.A.2. of the Part B [31 TAC 341.153(7)(C)];
3. The staffing pattern for the facility should be submitted including the qualifications of all key operating personnel whose duties include waste management [31 TAC 341.180(2)]; and
4. A physical description and current representative chemical analysis should be submitted for each waste which your company feels is not hazardous and which is commingled in a storage or disposal unit covered by the Part B application [31 TAC 341.180(3)].

Furthermore, HSWA sets forth minimum technological requirements on certain landfills and surface impoundments. Specifically, two or more liners, a leachate collection system above (in the case of a landfill) and between the liners, and ground-water monitoring are required for new landfill or surface impoundment units and for replacements or lateral expansions of existing landfill or surface impoundment units. Please refer to 40 CFR 264.221(c)-(e) and 264.301(c)-(e) and address these requirements in your Part B submittal accordingly.

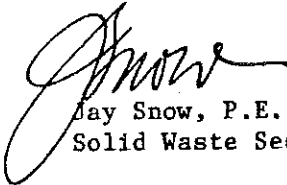
Please submit the original and two copies of your application including all related reports, together with six additional copies of Section I of the application form. For large, multiple-volume applications, please package only one set per box, where practical, and clearly mark which box contains the original.

Please avoid the submission of confidential information unless you feel it is essential. Each claim of confidentiality will be reviewed on a case-by-case basis. If confidential information must be submitted, please package the materials separately from the application and mark "Confidential" on the outside of the parcel. Any confidential material submitted should be referenced in your application although it is packaged separately. All claims of confidentiality must be substantiated at the time the information is submitted based on the Open Records Act, Article 6252-17a, V.A.C.S.

Once received, your application will be reviewed for administrative and technical deficiencies. Additional information may be requested at a later date to supplement your application.

Communications relating to Parts A and B of the permit application should be directed to the Solid Waste Section at AC512/463-8175. Communications relating to the Ground Water Compliance Plan Application should be directed to the Enforcement and Field Operations Division at AC512/463-7727.

Sincerely,



Jay Snow, P.E., Chief
Solid Waste Section

Enclosures

cc: TDWR District Office

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1985 (cont.)

This report is for the calendar year ending December 31, 1985

GENERATOR'S NAME: *Chemalby Inc.*

Rec'd by:

XV. GENERATOR'S EPA I.D. NO.

T.A.C

571X210891791294311

1 2

13 14 15

XVI. WASTE MINIMIZATION (narrative description)

No hazardous waste was created in 1985, which is believed to be the same as 1984.

Permits for processes which created hazardous waste were all withdrawn at our request.

Tear out here

